Payneteasy Technologies Limited 34/2 Cornwall's Lane, Gibraltar, GX11 1AA
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Privacy Policy

1. PREAMBLE

1.1. This Privacy Policy explains how Payneteasy Technologies Limited (the Controller, we, us or our) handles personal data when individuals visit https://payneteasy.com/ (the Website), use our AI assistant, submit an enquiry or otherwise interact with us through the Website.

1.2. This Policy covers personal data obtained through Website interactions and in connection with enquiries about our services. It does not cover personal data that we process on behalf of our clients in providing payment services: for that data we act as processor and the client's own privacy notice applies. The Controller's contact details appear in Section 10.

1.3. Section 2 describes the categories of personal data covered by this Policy. Section 11 explains the use of personal data in the AI assistant.

1.4. The latest version is available at https://payneteasy.com/legal/privacy_policy and in the Privacy Policy PDF linked from that page.

2. PERSONAL DATA COLLECTED

2.1. Depending on your interactions with us, we collect and process the following categories of data:

2.1.1. Contact and business details: your name, email address, telephone number if provided, company name and other business information that you choose to give us.

2.1.2. Communications: enquiry form submissions, messages sent through the AI assistant, the assistant's responses, timestamps and conversation identifiers. This includes personal data contained in information you voluntarily provide about your business or requirements.

2.1.3. Technical and interaction data: the Website page on which you use the assistant, your interface language, the country from which your request reaches us, technical markers of your interaction with the assistant and the time of your last activity (kept in your browser), and data associated with cookies or similar technologies. In the ordinary operation of the Website our hosting, content delivery and security providers also process your IP address and browser and device information; where analytics is active, pages visited and links followed are also recorded. Where you accept advertising cookies, the LinkedIn tag on the Website also sends LinkedIn the address of the page you visit, an identifier that LinkedIn assigns and technical information about your browser and device. When you submit an enquiry form, it also sends us the parameters of the advertising link by which you reached the Website (such as UTM parameters), the website that referred you, the page on which you entered the Website, the date of your first visit and your browser's technical identification string.

2.1.4. Privacy and communication preferences: choices relating to cookies and marketing, and records of notices or acknowledgements presented to you, including their version and date where recorded.

2.2. We receive information that you enter in forms or messages. Technical and interaction information can be collected automatically when you use the Website or chat, subject to the applicable settings and legal requirements.

2.3. You choose what to include in an enquiry or conversation. Fields needed to send a contact request are identified in the form. If you do not provide a usable contact address, we may be unable to

reply outside the chat. Providing additional business details is voluntary unless a specific service requires them.

2.4. Please do not send full payment card details, CVV codes, passwords, authentication codes, API credentials or sensitive personal information through the general Website chat or enquiry form. Information entered in free text may become part of the conversation and its processing.

2.5. Links to independent third-party websites are governed by those websites' own privacy notices. This does not exclude our responsibilities for providers that process data on our behalf in operating the Website or AI assistant.

3. PURPOSES OF PROCESSING

3.1. We use personal data for the following purposes, as relevant to your interaction:

3.1.1. Answering questions, managing enquiries and providing requested information about Payneteasy products and services.

3.1.2. Operating the AI assistant, interpreting the conversation, retrieving relevant Website content and providing responses and links.

3.1.3. Responding to contact requests and giving our authorised team the conversation context needed to handle them.

3.1.4. Taking steps at your request before a contract is concluded, where applicable.

3.1.5. Maintaining the Website and chat, diagnosing errors, protecting against misuse and improving the quality of our content and responses.

3.1.6. Measuring interaction with the Website and chat and reviewing recurring questions, using aggregated information where suitable.

3.1.7. Measuring the results of our advertising: the LinkedIn Insight Tag lets LinkedIn measure how visitors who reach the Website from our LinkedIn campaigns interact with it and report the campaign results to us. It operates only if you accept advertising cookies.

3.1.8. Sending product updates or other marketing communications by email if you have ticked the marketing box in our forms or have otherwise consented.

3.2. We apply the requirements of the data protection laws relevant to the processing, including the GDPR where applicable. Our processing follows the principles of lawful and transparent use, specified purposes, data minimisation, accuracy, limited retention and appropriate security.

4. RETENTION PERIODS

4.1. We retain contact and enquiry data, including the emails in which they reach us, for 12 months from our last contact with you.

4.2. The retention periods for the AI assistant and related records are:

4.2.1. Chat messages: the conversation stays in your browser's session storage until you close the tab. Our server records each exchange with the assistant — the question asked, the answer given, the date and time, the country from which the request reaches us and the address of the Website page — and keeps that record for 90 days. Our AI provider does not store the requests and responses it processes.

4.2.2. Contact requests and the emails that carry them: as stated in 4.1.

4.2.3. Browser storage: the conversation and any unsent contact form draft stay in session storage until you close the tab (a draft is also deleted when the form is sent). Technical markers of your interaction with the assistant (the state of the contact form, whether you have used the chat and the time of your last activity) stay in local storage until you clear

them; the assistant disregards them after 30 minutes without activity. Cookies: see our Cookie Policy.

4.2.4. Diagnostic and security logs and backups: our content delivery and security provider does not store the text of conversations. Our server's diagnostic and security logs may contain the text of messages and are kept for 90 days. Backups of the server are kept for 30 days, so a record deleted after 90 days leaves the backups within a further 30 days.

4.3. Personal data is deleted or irreversibly anonymised when it is no longer needed under the applicable retention rule. A longer period may apply where required by law or necessary for establishing, exercising or defending legal claims.

4.4. Requests for deletion are considered in accordance with the rights and exceptions under applicable law. Closing the chat, closing a form or clearing browser storage does not itself submit a request to delete records held by us or our providers. You can send a deletion request using the contact details in Section 10.

5. LAWFUL GROUNDS FOR PROCESSING

5.1. Where the GDPR applies, we rely on the following grounds, depending on the purpose:

5.1.1. Legitimate interests in responding to business enquiries, providing Website information and AI-assisted guidance, maintaining the Website, improving its content and protecting its security. We assess these interests against individuals' rights and reasonable expectations.

5.1.2. Taking steps at your request before entering into a contract with you, or performing that contract, where this ground applies to the particular processing.

5.1.3. Meeting legal obligations that require personal data processing.

5.1.4. Consent for activities that require it, including relevant marketing communications and non-essential cookies or similar technologies where required by law. Analytics and advertising cookies, including the LinkedIn Insight Tag, are set only if you accept them in the cookie banner, separately for each category.

5.2. Acknowledging this Policy or continuing to use the Website does not amount to general consent to every processing activity. Consent may be withdrawn as explained in Section 6.

5.3. Marketing consent is separate from a request for a response to an enquiry. Declining optional marketing does not prevent submission of a contact request.

5.4. The cookies and similar technologies used on the Website are described in our Cookie Policy.

6. YOUR RIGHTS

6.1. Subject to the conditions and exceptions in applicable law, you may:

6.1.1. Request access to the personal data we hold about you and receive a copy.

6.1.2. Ask for inaccurate data to be corrected and incomplete data to be completed.

6.1.3. Request deletion of your data or restriction of its use.

6.1.4. Object to processing based on legitimate interests. You can also object to use of your data for direct marketing.

6.1.5. Withdraw consent where processing relies on it. This does not affect processing lawfully carried out before withdrawal.

6.1.6. Receive data you provided in a portable format and request its transfer where the portability right applies.

6.1.7. Lodge a complaint with the Gibraltar Regulatory Authority, which acts as the Information Commissioner (www.gra.gi). If you are in the European Economic Area or the United Kingdom, you may also complain to the supervisory authority in your country of residence or work.

6.2. Send requests to privacy@payneteasy.com, preferably with PRIVACY POLICY in the subject. Explain the request and provide enough information to locate the relevant records, such as the email used, your name if supplied, or the approximate date and identifier of a chat.

6.3. We may ask for the minimum additional information needed to verify identity and locate records. A telephone number is not required for every request.

6.4. You may object at any time to the use of your personal data for direct marketing, including profiling related to it, by writing to privacy@payneteasy.com or using the unsubscribe link in a marketing email. We will then stop that use.

7. CONTROLLER OBLIGATIONS

7.1. We are responsible for demonstrating that our personal data processing meets applicable data protection requirements.

7.2. We address data protection when designing or changing our services, maintain required processing records and cooperate with the competent supervisory authority.

7.3. We apply appropriate organisational and technical safeguards and notify the supervisory authority and affected individuals about personal data breaches where the law requires this.

7.4. We respond to data protection requests without undue delay and in any event within one month of receiving them. Where the law allows and the request is complex or one of many, we may extend that period by up to two further months and will tell you so, with the reasons, within the first month.

8. RECIPIENTS AND INTERNATIONAL TRANSFERS

8.1. We apply organisational and technical measures appropriate to the risks of the processing to protect personal data against unauthorised access, disclosure, alteration and loss.

8.2. Access is limited to authorised staff and providers who need the information for the purposes described in this Policy. Our providers are: our hosting provider in Germany; Cloudflare, which delivers and protects the Website; Amazon Web Services, which runs the AI model behind the assistant through its Amazon Bedrock service in the European Union; Google, for Analytics, reCAPTCHA and Maps; LinkedIn, for advertising measurement; and our email provider. Enquiries sent through the Website are handled by authorised staff of Payneteasy Technologies Limited and contractors engaged by our group companies in Israel.

8.3. Where a provider acts as our processor, its handling of personal data is governed by processing terms and our instructions as required by applicable law. Data may also be disclosed where required by law or to protect legal rights. LinkedIn handles the data collected through its tag in accordance with its own privacy policy.

8.4. Our Website servers are located in Germany. Data may be processed in countries other than your own, including by the providers named above. Where a transfer is restricted under applicable data protection law, it must be supported by an applicable adequacy decision, appropriate contractual safeguards or another lawful mechanism. Israel is covered by an adequacy decision of the European Commission, on which transfers to Israel rely.

8.5. The AI model behind the assistant runs on Amazon Bedrock, a service of Amazon Web Services, in AWS data centres in the European Union. Amazon Web Services acts as our processor under its

data processing addendum and does not share the content of conversations with the developer of the model. Information about applicable safeguards can be requested at privacy@payneteasy.com.

9. CHANGES TO THIS POLICY

9.1. We update this Policy when our processing practices or applicable requirements change. The revision date is shown at the beginning, and the current version is made available on the Website.

9.2. Where we introduce a new use of personal data, we provide the information and any separate consent request required before beginning that use. Website use after an update is not treated as blanket consent to changes.

9.3. We communicate material changes through an appropriate Website or direct notice where required.

10. CONTROLLER AND DATA PROTECTION CONTACT

10.1. The Controller is Payneteasy Technologies Limited, company registration number 116094, with its registered office at 34/2 Cornwall's Lane, Gibraltar GX11 1AA.

10.2. Our Data Protection Officer can be contacted at privacy@payneteasy.com for questions about this Policy and the use of your personal data.

11. USE OF THE AI ASSISTANT

11.1. The Website AI assistant is an AI system, not a person. It helps visitors understand Payneteasy products, locate relevant materials and submit an enquiry to our team. It uses the conversation and our knowledge base to provide informational guidance.

11.2. To generate a response, our server sends to the AI provider your current message, the earlier messages of the current conversation, the address of the Website page you are on and your interface language, together with our operating instructions and selected content from our Website. These requests are made by our server in Germany, not directly from your browser. If personal data appears in your messages, it is included in this processing.

11.3. The assistant analyses the meaning and topic of a message, relates it to preceding questions, searches relevant content and formulates an answer or a clarification. It can identify requirements you state, such as an interest in a product, market or integration.

11.4. AI output may be incomplete or inaccurate. Answers are for general information and do not replace the General Terms or any agreement with us; a team member can clarify your request.

11.5. When you submit the chat contact form, your contact details, your comment and the conversation up to that point are sent by email to our team at info@payneteasy.com. The form provides a notice explaining this before you submit it.

11.6. Sending a message to the assistant and submitting a contact request are separate steps. Processing for a chat response begins when you send a message. A contact form that you start but do not submit stays in your browser's session storage and is not sent to us.

11.7. We use reports on the pages visited, the links followed and the questions asked of the assistant to diagnose issues and improve our content and the assistant's answers. If you accept analytics cookies in the cookie banner, Google Analytics records page views and interaction events. The text of your messages and your contact details are not sent to analytics.

11.8. Neither we nor our AI provider use the content of conversations to train or fine-tune AI models. Updating our knowledge base or reviewing response quality is not training an AI model.

11.9. We do not use the assistant to score individual visitors, to build advertising audiences or to take decisions about you based solely on automated processing that have legal or similarly significant effects. Enquiries are handled by our team.

11.10. You may use the Website contact form to reach our team instead of using the AI assistant. The retention arrangements in Section 4, recipient and transfer information in Section 8 and rights in Section 6 also apply to personal data processed through the assistant.