

INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA**KYC QUESTIONNAIRE - AML PROTECTION****1. Operator:**

Payout a.s., Juraja Závodského 97/106, 010 04 Žilina, Company ID: 50487787

Contact details of the operator: contact@payout.one

The operator has appointed a responsible person (DPO) within the meaning of the Personal Data Protection Regulation for the supervision of personal data protection.

Contact details of the responsible person:

Top privacy s.r.o., Robotnícka 11591/1J, 036 01 Martin, ID: 51421291

Email: dpo@payout.one

2. Purpose of personal data processing:

The processing of personal data is carried out for the purpose of detecting, checking, checking the identification and verifying the identification of users of payment services and their representatives. Payout a.s., as a provider of payment services, is obliged to carry out such checks and controls so that, as a obliged entity, it can identify an unusual business operation that indicates that its execution may lead to the legalization or financing of terrorism.

Customer verification procedure in the sense of mandatory legislation:

The operator obtains personal data through the so-called KYC questionnaire ("Know Your Customer"). KYC documents together with the customer's photo have become mandatory documents in accordance with Act no. 492/2009 on payment services and on the amendment of certain laws due to the constantly increasing number of fraudulent transactions and money laundering attempts.

After obtaining all the mandatory data in the sense of the KYC questionnaire, the operator will verify the customer through the Payout ID application, which will enable the verification of the person's identity through the Identify interface, where the user will verify his identity using an identity document. The next step will be the verification of the person from the point of view of AML control. This check is also carried out through the Identify interface (automated individual decision), where it is checked whether or not the given person is a politically exposed person, or whether or not he is on the sanction list. Finally, the verification is carried out, or finding out the name of the account holder. This verification is used to obtain account details for which the user gives consent.

3. Legality of personal data processing:

Personal data is processed on the basis of a legal obligation according to Article 6, paragraph 1 letter c) Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC (General Data Protection Regulation).

4. Legal obligation to process personal data:

The processing of personal data is carried out as a legal obligation pursuant to Act No. 492/2009 on payment services and on the amendment of certain laws and by the obliged person in accordance with Act no. 297/2008 Coll. on protection against the legalization of income from criminal activity and on protection against the financing of terrorism and on the amendment of certain laws.

5. List of personal data:

For the purposes of ascertaining, verifying and checking the identification of payment service users and their representatives, payment service users and their representatives are obliged to the payment service provider at his request for each transaction

To provide:

- if it is a natural person, including a natural person representing a legal entity, name, surname, address of permanent residence, address of temporary residence, social security number, if assigned, date of birth, nationality, type and number of identity document, and if it is a natural person, who is an entrepreneur, also the address of the place of business, object of business, designation of the official register or other official record in which it is entered, and the number of the entry in this register or record,
- if it is a legal entity, name, identification number, if assigned, address of headquarters, object of business or other activity, address of the location of the company or organizational components and the address of the place of performance of the activity, a list of persons forming the statutory body of this legal entity and information about them in the scope according to the first point, the designation of the official register or other official record in which this legal entity is registered, and the number of the entry in this register or record,
- contact telephone number, fax number and email address, if any,
- documents and data proving and documenting
 - o the ability of the user of payment services to fulfill obligations from the trade,
 - o required security of trade obligations,
 - o authorization to represent, if it is a representative,
 - o fulfillment of other requirements and conditions for concluding or executing a transaction, which are established by this law or special regulations or which are agreed with the payment service provider,

The identification of the affected persons is carried out in the scope of personal data:

- a) In the case of a natural person: name, surname, social security number, date of birth, address of permanent residence or other place of residence, nationality, identity document number, in the case of entrepreneurs - identification of the address of the place of business, identification number (if assigned), designation of the official register or other official the register in which this entrepreneur is registered and the number of the entry in this register or register.
- b) In the case of a legal entity: the name and address of the registered office, identification number, designation of the official register or other official record in which the legal entity is registered and the number of the entry in this register or record, and the identification of the natural person who is authorized to act on behalf of the legal entity.
- c) In the case of a person who is represented on the basis of a power of attorney, in the case of a person who is represented on the basis of a power of attorney, ascertaining his data according to letter a) or b) and ascertaining the data of a natural person who is authorized to act on behalf of this legal entity or natural person in the scope of the data according to letters a).
- d) In the case of a minor who does not have an identity document: finding out the name, surname, birth number or date of birth, if the birth number was not assigned, permanent residence or other residence, nationality of the minor and his legal representative.

The operator performs verification of the identification of the affected persons:

- a) by verifying the data in their identity document, if it is provided there, and verifying the likeness of the person with the likeness in their identity document in their physical presence or using technical means and procedures, if these means and procedures allow verification of identification at a level that is from the point of view of the trustworthiness of the verification result, similar to the verification in physical presence; in the case of a natural person-entrepreneur, also verification of

- data based on documents, data or information obtained from the official register or other official records in which the entrepreneur is registered, or from another reliable and independent source.
- b) in the case of a legal entity, verification of data based on provided documents, data or information obtained from the official register or other official records in which the legal entity is registered, or from another reliable and independent source and verification of the identification of the natural person who is authorized to act on behalf of the legal entity and verification of the authorization to act on behalf of the legal entity,
 - c) in the case of a person who is represented on the basis of a power of attorney, verification of his data in the scope of data based on the provided documents, data or information obtained from the submitted power of attorney with certified signature, official register or other official records or from another reliable and independent source and verification of the identification of the natural person , who is authorized to act on the basis of a power of attorney, in her identity document in her physical presence,
 - d) in the case of a minor who does not have an identity document, verification of the type and number of the identity document and the appearance of the minor's legal representative present with the image in his identity document,
 - e) proof of the client's identity with a qualified electronic signature, if the client has already been identified or using an official authenticator; verification of identification using a qualified electronic signature or official authenticator is considered verification of identification in the physical presence of the client,
 - f) verification of identification by another method, if such a method is allowed by a special regulation, e.g. verification by a notary.

6. Affected persons:

Clients of Payout a.s. who use payment services (account information service and initiation service) within the meaning of Act No. 492/2009 on payment services and on the amendment of certain acts of the Act.

Natural persons and representatives of legal entities who are required to identify themselves, pursuant to Act No. 297/2008 Coll. on protection against the legalization of income from criminal activity and on protection against the financing of terrorism and on the amendment of certain laws.

7. Personal data storage periods:

Personal data are disposed of after the expiration of the mandatory storage period according to § 19 of Act no. 297/2008 Coll., which is five years from the end of the contractual relationship with the client or from the execution of the transaction, or after the extended storage period has expired, if requested by the Financial Intelligence Unit.

8. Legitimate interest of the operator:

Personal data is not processed for the legitimate interests of the operator.

9. Transfer of personal data to third countries:

Personal data is not transferred to third countries.

10. Disclosure of personal data:

Personal data is not published.

11. Automated individual decision-making and profiling:

When processing personal data, automated individual decision-making and profiling takes place. Such processing occurs due to the effective identification of an unusual business operation, which indicates that its execution may lead to the legalization or financing of terrorism according to Act No. 492/2009 on

payment services and on the amendment of certain laws. For the purpose of automated decision-making in the area of protection against money laundering (AML), the operator carried out an impact assessment on the protection of personal data and took measures to mitigate the impact on the rights of the affected persons.

12. The source from which the personal data comes, or information about whether the data comes from publicly accessible sources:

For a natural person-entrepreneur (and other legal entities), the operator verifies data on the basis of provided documents, data or information obtained from the official register or other official records in which the entrepreneur (legal entity) is registered, or from another reliable and independent source.

13. Category of personal data:

- General personal data,
- Biometric data (identification data of the affected person - face). Payout uses available technical means that enable electronic identification of persons through remote video identification. Information recorded during this process can be reviewed, analyzed, verified and confirmed. The video identification process is in accordance with the provisions of the AML Act. The company Payout protects the provided Biometric data through security devices in accordance with legal regulations and information security requirements.

14. Technical and organizational security measures:

Organizational and technical measures for the protection of personal data are processed in the operator's internal regulations. Security measures are carried out in the areas of physical and object security, information security, cryptographic protection of information, personnel, administrative security and protection of sensitive information, with precisely defined powers and duties specified in the security policy. Payout protects the provided Biometric data through technical means and information systems in accordance with legal regulations and information security requirements.

15. Other authorized entity:

Another authorized entity	Legal basis
Another authorized entity	On the basis of Article 6 par. 1 letter c) Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC (General Data Protection Regulation).
A bank or other financial institution	On the basis of Act no. 429/2009 Z. from. on payment services and on amendments to certain laws
Authorities active in criminal proceedings	On the basis of Act no. 297/2008 Coll. on protection against the legalization of income from criminal activity and on protection against the financing of terrorism and on the amendment of certain laws.
Ministry of the Interior of the Slovak Republic	On the basis of Act no. 297/2008 Coll. on protection against the legalization of income from criminal activity and on protection against the financing of terrorism and on the amendment of certain laws.
Financial intelligence unit of the Slovak Republic	On the basis of Act no. 297/2008 Coll. on protection against the legalization of income from criminal activity and on protection against the financing of terrorism and on the amendment of certain laws.
Financial Administration of the Slovak Republic	On the basis of Act no. 297/2008 Coll. on protection against the legalization of income from criminal activity and on protection against the financing of terrorism and on the amendment of certain laws.
National Bank of Slovakia	On the basis of Act no. 429/2009 Z. from. on payment services and on amendments to certain laws

16. Intermediaries:

Intermediary	Legal basis
Web Shield Services GmbH	On the basis of an intermediary agreement pursuant to Article 28 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC (General Data Protection Regulation)
iDenfy	Based on Article 28 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC (General Data Protection Regulation)
FingerprintJS Inc.	On the basis of an intermediary agreement pursuant to Article 28 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC (General Data Protection Regulation)
PayU	On the basis of an intermediary agreement pursuant to Article 28 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC (General Data Protection Regulation)

17. Rights of data subjects:

The person concerned has the right to request from the operator access to personal data that is processed about him, he has the right to correct personal data, the right to delete or limit the processing of personal data, the right to object to the processing of personal data, the right to the ineffectiveness of automated individual decision-making, including profiling, the right to portability of personal data, as well as the right to submit a proposal to initiate proceedings to the supervisory authority. If the operator processes personal data based on the consent of the person concerned, the person concerned has the right to withdraw his consent to the processing of personal data at any time. Withdrawal of consent does not affect the lawfulness of personal data processing based on consent prior to its withdrawal. The affected person can exercise their rights by sending an email to the address of the operator listed above, or in writing to the address of the operator listed above.