

KYC & AML - Policy

Your integrity is important to us and we are responsible for any and all personal information that you provide us with. This policy describes how we treat, store and manage your personal information. It also describes your rights and how to use them. It is important that you read and understand the policy and feel safe in knowing how we treat your personal information

Responsibility for managing personal information

Bit4M Payments AB, Swedish organizational number 559050-2000 is responsible for the treatment of personal information described in this policy.

If you have any questions you can reach us at

E-mail: info@plingpay.com

Adress: Anckargripsgatan 3, S-21119 Malmö, Sweden

Any claims requests will be managed in accordance with local regulations such as the PSD2 in the EU.

Information that we need and how we access it

All information that we need is accessed either by you giving the information directly in app or through third parties that you yourself connect to our service.

The information asked for by us are:

- Photo ID (passport or national ID card) held up next to face
- Photo ID (passport or national ID card) zoomed in
- Utility bill (A formal bill with your name and address on, or an official document with the same information)

These three documents are considered highly confidential. They are stored offline for the purpose of meeting the legal requirements of identifying the clients for purposes of anti money laundering and counterterrorism identification. No online copies of them will be kept in any database or system.

This information may be retrieved and handed to relevant authorities on formal request from authorities. It may also be shared with our partner exchanges and other partners in such cases where that is necessary for them in turn to meet their compliance obligations in order to process transactions that directly involves you as a client.

Non-mandatory information that may nonetheless be of great utility for you to share with us such as bank account, credit card or other sensitive financial services information that need to be accessible to our systems and to you (for changing it) will be stored online in our databases, but securely encrypted. It will not be stored in app or be searchable for other users.

Information related to your transaction history will likewise be accessible in our systems, though securely encrypted from outside access.

Other information requested by us

- Phone number (mandatory for purposes of 2 factor verification and enhancing your security)
- Email
- Name

These three types of information are openly available in the app and anyone can search for you on that basis (unless specifically requested by you as a client to keep confidential) when for instance they want to send money to you through the app.

Any and all information mentioned in this chapter may be handed over to legitimate authorities on formal request, if that request is specifically in regards to you or your transactions. It may also be shared with third parties when this is specifically necessary for legal and compliance reasons in order to process transactions you are involved in. Under no circumstances other than what is here stated will it be shared in any other fashion or purpose than is here stated.

What is the legal basis for our storing of sensitive personal information?

Specifically this is done to be able to administer and provide our services to you in accordance with the law in countries where you or people you send ot or receive money to/from reside. We do not store sensitive personal information for any other reasons then this being required for legal or compliance reasons and personal information of any kind otherwise only for reasons of your convenience when using the service.

How long do we store your personal information?

We store any and all information for as long as we are required to do so by law. Typically financial information may need to be stored for 7 years throughout the EU. This may be subject to change. In other parts of the world the rules may be different.

Your rights

As registered with us you have the following rights:

- You have the right to request full disclosure on any information stored on you and your transactions.
- You have the right to correct or ask to have us correct any information stored on you that is inaccurate.
- If this does not violate any legal obligations on our part, you have the right to get your personal information deleted under the following conditions:
 - The information is no longer needed to fulfill the reasons it was intended for
 - Something stored which requires your consent can be deleted when you remove your consent
 - If there is a conflict of interests and there is no justifiable reason to keep the information which is more important than your reasons for removal.
 - If the information has been used illegally.
 - If deletion is necessary to fulfill a legal obligation.
 - If you object to using the information for purposes of marketing

These rights do not apply if there is a legal obligation for us to keep the information.

- You have the right to request a limit to how the information is used, but not to such an extent that it adversely affects either legal obligations or the functionality of the service. In the latter case this might lead to suspension of services.
- You have the right to object to usage of personal data based on a conflict of interest. To proceed our processing of data we would then be required to show a valid reason that outweighs your interests and rights.
- You always have the right to object to any direct marketing where your personal information is used without consent. If you do then the information may no longer be used in such a way.

If you require further information please contact us!