

This page informs You of xpate's (hereinafter — Company) policies regarding the collection, use, and disclosure of personal data when You use Company's service and the choices You have associated with that data. Company's customer's private data security is the first priority for Company. Company would like to highlight that Company fully obeys all the laws and regulations. This privacy policy applies only to the xpate web-site. By using xpate web-site You agree with all the policies described in this page.

Your personal data may be transferred to and processed at a destination outside the European Economic Area (hereinafter – "EEA") including countries that have different data protection rules than Your country. It may also be processed by Company's staff operating outside the EEA who work for xpate or one of xpate's service providers. By using xpate platform and services, You consent to Your Personal Data being transferred to other countries.

Types of information collected

Company collects several different types of information for various purposes to provide and improve Company's service to You.

Personal data

While using Company's service, xpate asks You to provide Company with certain personally identifiable information that can be used to contact or identify You, including first name and last name, email address, phone number, address, postal code and financial account details. Additionally, Company may collect information about You and Your business from third parties for the purposes of identification and verification as Company is obliged to in accordance with legal causes.

Information from third parties

To avoid the potential fraud Company collects information from third parties such as including, but not limited to, Company's business partners, service providers and subcontractors, credit agencies and/or payment processors that are authorized to share such information. xpate also reserves the right to periodically examine credit ratings in legal limits of each account and close accounts based on the received information analysis.

Transaction information

In terms of usage of Company's services xpate saves Your information such as transaction type, transaction amount, payer's details (such as card, name, email), address transaction comes from/sent to for the purpose of implementing Company's services.

Usage Data

Company may also collect information about how the service is accessed and used (hereinafter Usage Data). This Usage Data may include information such as Your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of Company's services that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data. This information is used by xpate for the operation to increase the quality of the service, and to provide general statistics and analysis regarding use of the website as well as for checking unauthorized access.

Additional information

If any problems in verification of information provided to xpate has occurred, Company may ask additional information about You and Your business to be sent by email or post (e.g. Resolution of Directors, Disclosure of Shareholders, documentary proof to confirm valid existence of the business (not older than 6 months ago), utility bill (not older than 3 months) to confirm the physical address or bank account statement). xpate reserves the right to make an onsite visit to Your company.

Information collected during correspondence with customer service

All the correspondence practiced between You and any of xpate team members (whether through, including but not limited to email, telephone web-site chat, fax or postal correspondence) will be stored in Your account for the purposes of Company's customer service improvement. In accordance with certain legislation this information can be deleted or blocked.

Tracking & Cookies Data

Company uses Cookies and similar technologies to collect information about You. Information collected may include the type of device You use to have access to Company's web-site, Your browser, software versions and Your behavior in the web-site.

Examples of Cookies xpate uses:

- Session Cookies: to operate Company's services;
- Preference Cookies: to remember Your preferences and various settings;
- Security Cookies: for security purposes.

Use of data

xpate uses collected data for various purposes:

- To provide and maintain the service;
- To provide analysis or valuable information so that xpate can improve the platform and provided services;
- To provide customer care and support;
- To follow all the regulation requirements;
- To protect the security of xpate;
- To notify You regarding changes in this privacy policy.

Providing and maintaining services

The processing of personal data is necessary in the purposes to provide and maintain the services. Company collects the data to make correct, legal and secure services possible for all of its customers.

Platform and services improvement

xpate uses collected data to improve design, usability, to develop new features and new channels and forms of connection on the basis of customers' needs concluded from analysis of data.

Customer care and support

Collected data is used to personalize all types of communication with customers. It may be notifications on services that are connected to the business model of the customer, or updates in terms of changes of service reinforced with certain appropriate circumstances.

Regulation requirements

Data required by xpate is used to meet all the requirements of legal regulations.

Security reasons

Data collected is used for the purpose of security of xpate and its customers. It is due to avoid money laundering, potential fraud and illegal actions.



Privacy policy changes notification

xpate reserves the right to periodically make updates to this Privacy Policy. Every customer will be notified about the changes that happened to be informed of how xpate is dealing with personal data.

Transfer of Data

xpate does not sell or rent any of the collected information to third parties. It will be used to process full service delivery. This may involve sharing data with data security services, compliance systems, financial services, credit and tax authorities.

xpate may disclose Your personal data in the good faith belief that such action is necessary to:

- To comply with a legal obligation;
- To protect and defend the rights or property of xpate;
- To prevent or investigate possible wrongdoing in connection with the services;
- To protect the personal safety of customers or the public;
- To protect against legal liability;
- To provide and analyze Service that we provide.

Service Providers

xpate may employ third party companies and individuals to facilitate Company's service, to provide the services on Company's behalf, to perform service-related services or to assist Company in analyzing how services are used.

Data Security

The security of Your data is important to the Company. xpate uses all the latest data protection tools with the highest standards in the market. Company provides the data only to those employees who need it to perform their activities. For higher level security, it is recommended to protect Your password, use the latest up-to-date browser while using xpate's platform.

Any data and information provided to Company is encrypted using advanced technologies, and xpate's website has security measures in place to protect against the loss, misuse and alteration of any data and information received by Company.

Company will keep collected information as long as it is necessary for providing the services and to meet the requirements of all applicable laws and legislation.

Choices available to You

You have choices when it comes to the privacy practices and communications described in this Privacy Policy. Many of the choices are explained when You sign up to the platform or use Company's services.

Choices relating to the Personal Data collection and use

You may decline to provide Personal Data when requested. In this case, You use crucial part of xpate's services. You also have the ability to avoid sharing information collected from the device You use while accessing xpate's platform (including but not limited to location and Usage Data) and used by Company through the settings of the platform.

Choices relating to Cookies

You may have the ability to change the settings of cookies. Your browser or a device may allow You turn off or delete certain cookies and other tracking technologies. By disabling certain cookies You may limit Yourself from using certain services provided by xpate.



Choices relating to Communication

Company may send You advertisement about the services and products including but not limited to emails, text messages and push notifications. You may refuse or change preferences of these marketing communications in platform settings. Additionally, you may receive notifications with important information and other communication requested by You. These communications may not be refused, however You can choose the channel and format through which You prefer to receive these messages.

Links to third-party resources

You may find links to other sites that are not managed by xpate. If You click on the link of a third-party resource, You will be redirected to the website of this third-party resource. xpate strongly recommend You to read the privacy policy of each site You visit.

Change of Your personal data

You can check the data You provided to us at any time, can change it for Your account online or by contacting xpate.

Children's Privacy

xpate services do not address anyone under the age of 18 (hereinafter Children). xpate does not knowingly collect personally identifiable information from anyone under the age of 18. If You are a parent or guardian and You are aware that Your Children has provided Company with Personal Data, please contact xpate.

Your Data Protection Rights under the General Data Protection Regulation (GDPR)

If You are a resident of the European Economic Area (EEA), You have certain data protection rights. xpate aims to take reasonable steps to allow You to correct, amend, delete or limit the use of Your Personal Data. If You wish to be informed about what Personal Data xpate holds about You and if You want it to be removed from xpate's systems, please contact the Company.In certain circumstances, You have the following data protection rights:

- The right to access, update or delete the information we have on You. Whenever made possible, You can access, update or request deletion of Your Personal Data directly within Your account settings section. If You are unable to perform these actions Yourself, please contact xpate to assist You.
- The right of rectification. You have the right to have Your information rectified if that information is inaccurate or incomplete.
- The right to object. You have the right to object to Company's processing of Your Personal Data.
- The right of restriction. You have the right to request that Company restricts the processing of Your personal information.
- The right to data portability. You have the right to be provided with a copy of the information that Company has on You in a structured, machine-readable and commonly used format.
- The right to withdraw consent. You also have the right to withdraw Your consent at any time where xpate relied on Your consent to process Your personal information.
 Please note that we may ask You to verify Your identity before responding to such requests. You have the right to complain to a Data Protection Authority about our collection and use of Your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Contact for Privacy Policy

If You have any questions about this Privacy Policy, please contact Company by email hello@xpate.com

