

PRIVACY NOTICE

General Data Protection Regulation (UE) 679/2016

Dear Customer,

We wish to inform you that Regulation (EU) 679/2016 (hereinafter "GDPR") provides for the right to the protection of personal data. In compliance with current legislation, the processing of such data will be based on principles of fairness, lawfulness, accuracy, transparency, minimization, purpose and storage limitation, as well as protection of your privacy and respect for your rights.

1. Who processes customers' personal data

The data controller is Janata Exchange Company s.r.l., VAT number 06932451005, with registered office at Via Giacomo Pagliari n. 15, 00198 Rome (Italy), Tel. 06/44341389, email janataexchangesrl@gmail.com, certified email janataexchange@legalmail.it

Who is responsible for ensuring the correct processing of personal data?

We have appointed a Data Protection Officer to verify that our processing of personal data complies with this policy and with Italian and European legislation. The Data Protection Officer can be contacted at the following addresses: Email privacy@janataexchange.it

2. For what purpose and on what legal basis do we process personal data?

2.1. Your personal data is processed to comply with the legal obligations to which we are subject.

Your personal data is processed where necessary to enable us to comply with the regulations to which we are subject, including credit and financial regulations. We process your personal data to:

- a) manage and report risks (financial, credit, legal, compliance, or reputational, etc.) that Janata Exchange Company s.r.l. may encounter in the course of its activities;
- b) contribute to the fight against tax fraud and comply with tax control and reporting obligations;
- c) record transactions for accounting purposes;
- d) exchange and report various operations, transactions, or orders;
- e) detect and prevent corruption;
- f) respond to an official request from a duly authorized local or foreign financial, tax, administrative, criminal, or judicial authority, arbitrators or mediators, law enforcement agencies, government agencies, or public bodies;
- g) comply with legal obligations (administrative, accounting, and tax), regulations, and/or EU and international legislation;
- h) manage the contractual relationship and money transfers (contractual and pre-contractual purposes);
- i) manage orders, complaints, reports, and/or requests for information, including communications;
- j) manage disputes (any breaches of contract, warnings, settlements, debt collection, arbitration, legal disputes, etc.) and risk control to prevent possible fraud, insolvency, or non-compliance.

Processing of personal data for anti-money laundering and countering terrorist financing purposes.

We also process your data to prevent money laundering and terrorist financing.

For AML/CFT purposes and to comply with international sanctions, we carry out the processing operations listed below to fulfill our legal obligations, such as:

- a) adequate customer verification, in order to identify, verify, and confirm the identity and information of the customer and, where applicable, that of their beneficial owner and executor;
- b) enhanced customer verification, where the conditions set out in the Anti-Money Laundering Regulations apply, as well as based on the Company's risk approach;
- c) periodic updating of customer identification documentation and information acquired when the relationship was established;
- d) reporting of suspicious transactions to the competent authorities;
- e) transmission of information flows to the competent authorities;
- f) controls implemented and aimed at:
 - preventing the establishment of relationships with customers who are critical in accordance with the aforementioned regulations or who are otherwise not in line with the Company's risk management policies;
 - ensuring adequate ongoing monitoring of the relationship with its customers.

2.2. Your personal data is processed to execute a contract to which you are a party or to implement pre-contractual measures taken at your request.

Your personal data is processed when it is necessary to enter into or perform a contract in order to:

- a) assess whether we can offer you a product or service and under what conditions;
- b) provide services and manage the contractual relationship;
- c) recover any debts owed to Janata Exchange Company;
- d) respond to your requests and provide assistance.

2.3. Your personal data is processed to satisfy our legitimate interest or that of third parties.

Where we base a processing activity on a legitimate interest, we balance this with your interests or fundamental rights and freedoms to ensure that there is a fair balance between them. Therefore, in the course of our business, we process your personal data on the basis of legitimate interest in order to:

- a) manage the risks to which we are exposed;
- b) have proof of transactions and operations carried out by you, including electronic evidence;
- c) manage, prevent, and detect fraud;
- d) recover debts;
- e) manage legal claims, complaints, and defense in the event of litigation;
- f) improve IT security and ensure business continuity.

No processing based on automated decision-making processes (such as profiling) is carried out.

Nature of the data and provision (including the consequences of refusing to provide the data)

The personal data processed are those necessary for the execution of the pre-contractual and contractual relationship with you, including, but not limited to:

personal identification and contact details: first name, last name, residential address, email address, telephone number, tax identification number, identity documents, identification code (ID number) issued to the customer for the execution of the money transfer service.

data relating to financial and family situation: educational qualifications, family composition, employment status, real estate owned.

judicial data and data relating to politically exposed persons (PEPs) for the purposes of anti-money laundering, anti-terrorism, and customer due diligence.

Should we process categories of data other than those indicated above, you will be provided with appropriate information, highlighting the legal basis and purpose of the processing, and specific consent will be obtained where necessary (e.g., in the case of processing data relating to your health).

The provision of personal data is mandatory in order to fulfill our legal and/or contractual obligations. Failure to provide such data, even partially, could make it impossible for us to fulfill our contractual, pre-contractual, or legal obligations.

Data transfer

Your personal data will not be transferred abroad to non-EU countries that do not ensure adequate levels of protection for individuals. In the event of a transfer of personal data to countries that do not ensure adequate levels of protection, this will only be done after Janata Exchange Company s.r.l. and said third parties have entered into specific contracts containing appropriate safeguards and guarantees for the protection of personal data (e.g., standard contractual clauses approved by the European Commission), or only in the presence of another requirement in accordance with applicable Italian and European legislation (i.e., because the processing is necessary for the performance of a contract concluded between the data subject and the data controller or for the implementation of pre-contractual measures taken at the request of the data subject, or is necessary for the conclusion or performance of a contract between the data controller and another natural or legal person in favor of the data subject).

How long we retain data

The data collected will be stored for as long as necessary to respond to requests and, even after termination, to manage any contractual, pre-contractual, or legal obligations connected with or arising from them.

Therefore, the criteria used to determine the storage period are established by:

- (i) specific legal provisions governing the activities of the Data Controller;
- (ii) tax legislation regarding the processing of administrative and accounting data (10 years); in particular, for financial data (e.g., invoices, payments, refunds, etc.), the retention period required by applicable tax and accounting laws is applied.

Finally, personal data may also be retained for as long as permitted by Italian law to protect the legitimate interests of the Data Controller (Article 2947, paragraphs 1 and 3 of the Italian Civil Code).

Who we share personal data with (recipients and categories of recipients)

The data collected, whether provided on a mandatory or optional basis, may be disclosed to employees specifically authorized by the Data Controller, to payment service agents used by the Customer/Sender to provide the service, to external professional or consulting firms, banks or credit institutions, public bodies, the Revenue Agency, Supervisory Authorities (Bank of Italy - UIF). In any case, the data collected will not be disclosed. For exclusively organizational and functional requirements and for purposes strictly connected and related to the provision of our services, personal data may be disclosed to other parties that perform outsourced activities and services, appointed where necessary as external data processors (e.g., marketing companies or platforms, commercial partners of social media platforms, service providers or IT solutions, etc.). Furthermore, in performing the money transfer service provided to the Customer/Sender, Janata Exchange Company s.r.l. communicates the personal data of the Customer/Sender to other banks and credit institutions with which it has agreements, so that the latter can treat them as independent account holders, for the sole purpose of carrying out certain checks for their own protection, of the same type as those carried out on a mandatory basis. Sender to other affiliated banks and credit institutions so that they may process it as independent data controllers, for the sole purpose of carrying out certain checks for their own protection, similar to those carried out by Janata Exchange Company s.r.l. in accordance with current legislation on the prevention of the

use of the financial system for money laundering or terrorist financing. This communication is necessary and does not require the consent of the Customer/Sender. In any case, the data will not be disclosed.

How we guarantee customer rights

At any time, you have the right to obtain confirmation of the existence or otherwise of your personal data, to know its content and origin, to verify its accuracy or request its integration or updating, or correction, as well as the right to request deletion, portability to another data controller, transformation into anonymous form, or limitation of the data processed, as well as to object in any case, for legitimate reasons, to their processing, by communicating this in writing to the addresses of Janata Exchange Company s.r.l. or the Data Protection Officer, or the Data Processor as indicated above. Finally, please note that you always have the right to lodge a complaint with the Italian Data Protection Authority to exercise your rights or for any other matter relating to the processing of your personal data (www.garanteprivacy.it, section "Forms/Complaints").