

Privacy policy

This page informs you of our policies regarding the collection, use and disclosure of personal information we receive from users of our site (<https://serenityPay.io>). Serenity Financial OÜ (hereinafter referred to as Company), address: Rännaku pst12, Tallin, Harju county, 10917, Estonia is the operator of the website. We use your personal information to better understand your usage of the site, and to collect traffic statistics.

By using the site, you agree to the collection and use of information in accordance with this policy.

Log Data

Like many site operators, we collect information that your browser sends whenever you visit our site ("Log Data"). This Log Data may include information such as your computer's Internet Protocol ("IP") address (with replaced last byte), browser type, browser version, the pages of our site that you visit, the time and date of your visit, the time spent on those pages and other statistics.

Cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our site.

We use cookies for the following purposes:

- To keep track of whether you have pressed the "OK" button on the cookie disclaimer, so we don't bother you with the notification if you have.
- Our Analytics software (Google Analytics) uses cookies to measure and better understand user-interactions on our Site. You can read more about how Google Analytics uses cookies [here](#).

Google Analytics

We use a third-party JavaScript plug-in provided by Google called "Google Analytics" to provide us with useful traffic statistics and to better understand how you use our site. We do not have direct access to the information obtained from Google Analytics, but Google provides us with a summary through their dashboard.

We may share the information obtained from Google Analytics with business partners who are interested in advertising on our website. The information shared with these business partners will not contain any personally identifying information (Google does not provide us with direct access to the data and therefore we cannot see this information).

You can opt-out of having your information collected by Google Analytics by downloading the Google Analytics opt-out browser add-on provided by Google. This will prevent your information being used by Google Analytics. Doing this will not affect your ability to use our Site in any way. You can download the opt-out browser add-on [here](#). We also honor the Do Not Track header and will not track visitors who have Do Not Track switched on.

We are entitled to transfer your personal data to third parties abroad for the purposes of the data processing described in this Privacy Policy. This concerns especially the following receiver(s):

International transfer of personal data

- our websites service providers
- e-commerce provider such as payment solution providers to assist us in the processing of your online payments.

They are obliged to protect data privacy to the same extent as we ourselves. If the level of data protection in a given country does not correspond to the European data protection level, we contractually ensure that the protection of your personal data corresponds to that in the EU at all times by concluding agreements using the standard contractual clauses and complying with the GDPR.

Data security

We use appropriate technical and organizational security measures to protect your stored personal data against manipulation, partial or complete loss, and unauthorized access by third parties. Our security measures are continuously being improved in line with technical developments.

Please note that any data transmission on the Internet (e.g. communication by e-mail) is generally not secure and we accept no liability for data transmitted to us via the Internet. Unfortunately, absolute protection is not technically possible.

This information does not apply to the websites of third parties and the corresponding links given on our websites. The Company assumes no responsibility and liability for these.

Your Rights regarding your data

Right to confirmation

You have the right to obtain confirmation from the Company as to whether or not personal data concerning you is being processed. If you wish to avail yourself of this right of confirmation, you may, at any time, contact the responsible person.

Right to access

You have the right to obtain from the Company free information about your personal data stored at any time and a copy of this information. Furthermore, you will have access to the following information:

the purposes of the processing;

the categories of personal data concerned;

the recipients or categories of recipients to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organizations;

where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;

the existence of the right to request from the Company rectification or erasure of personal data, or restriction of processing of personal data concerning you, or to object to such processing;

the existence of the right to lodge a complaint with a supervisory authority;

where the personal data are not collected directly from you, any available information as to their source; and

the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for you.

If you wish to avail yourself of this right of access, you may at any time contact the responsible person.

Right to rectification

You have the right to obtain from the Company, without undue delay, the rectification of inaccurate personal data concerning you. Taking into account the purposes of the processing, you shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement. If you wish to exercise this right to rectification, you may, at any time, contact the responsible person.

Right to erasure (right to be forgotten)

You have the right to obtain from the Company the erasure of personal data concerning you as soon as possible, and the Company shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

The personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed;

You withdraw consent to which the processing is based according to point (a) of Article 6(1) of the GDPR, or point (a) of Article 9(2) of the GDPR, and where there is no other legal ground for the processing;

The data subject objects to the processing pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of the GDPR;

The personal data has been unlawfully processed;

The personal data must be erased for compliance with a legal obligation in accordance with the applicable law to which the Company is subject; and/or

The personal data has been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

If any one of the aforementioned reasons applies, and you wish to request the erasure of personal data stored by the Company, you may at any time contact the responsible person. The responsible person at the Company shall promptly ensure that the erasure request is complied with as soon as possible.

Right to restriction of processing

You have the right to obtain from the Company restriction of processing where one of the following applies:

the accuracy of the personal data is contested by you, for a period enabling the Company to verify the accuracy of the personal data;

the processing is unlawful and you oppose the erasure of the personal data and requests instead the restriction of their use instead;

the Company no longer needs the personal data for the purposes of the processing, but they are required by you for the establishment, exercise or defense of legal claims; and/or

the data subject has objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the Company override those of the data subject.

If any one of the aforementioned conditions is met, and you wish to request the restriction of the processing of personal data stored by the Company, you may at any time contact the responsible person. The responsible person will arrange the restriction of the processing.

Right to object

You have the right to object, on grounds relating to your particular situation, at any time, to the processing of personal data concerning you, which is based on point (e) or (f) of Article 6(1) of the GDPR. This also applies to profiling based on these provisions.

The Company shall no longer process the personal data in the event of the objection, unless the Company can demonstrate reasonable grounds for the processing, which override the interests, rights and freedoms of you, or for the establishment, exercise or defense of legal claims. In order to exercise the right to object, you may directly contact the responsible person.

Automated individual decision-making, including profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you, or similarly significantly affects you, as long as the decision (1) is not necessary for entering into, or the performance of, a contract between you and the Company, or (2) is not authorized by the applicable law and which also lays down suitable measures to safeguard your rights and freedoms and legitimate interests, or (3) is not based on your explicit consent.

If the decision (1) is necessary for entering into, or the performance of, a contract between you and the Company, or (2) it is based on your explicit consent, the Company shall implement suitable measures to safeguard your rights and freedoms and legitimate interests, at least the right

to obtain human intervention on the part of the controller, to express their point of view and contest the decision.

Please note that the Company does not use automatic decision-making but we may use profiling according to these Privacy Policy rules.

Right to withdraw data protection consent

You have the right to withdraw your consent to processing of your personal data at any time.

If you wish to exercise the right to withdraw the consent, you may at any time directly contact the responsible person.

Duration of the storage

The Company will process and store the personal data of the data subject only for the period necessary to achieve the purpose of storage, or as far as this is granted by the applicable laws or regulations. If the storage purpose is not applicable, or if a storage period prescribed by the applicable laws expires, the personal data is routinely erased in accordance with the legal requirements.

Minors

The Company does not knowingly collect or use any personal data from minors. A minor may be able to willingly share personal information with others, depending on the products and/or media channels used. If a minor provides us with their information without the consent of their parent or guardian, we will ask the parent or guardian to contact us for the purpose of deleting that information.

Updates to our Privacy Policy

The Company may update this Privacy Policy from time to time and inform you on the websites that the policy has been amended. The current version of the Privacy Policy, as published on our website, is applicable. With each update to our policies, we will note which sections have been updated.

Contact Us

If you have any questions about our privacy policy, or how your data is being collected and processed, please e-mail clients@serenitypay.io.