

# WeWay Privacy Notice

Last Updated: **October 28, 2021**

The WeWay platform accessible at <https://weway.io/> (the “Platform”) is provided by WeWay Group Limited (“WeWay”, “we”, “us”, “our”). With respect to the personal data collected within the Platform, we act as a data controller. “You”, “your” refers to you as a natural person, visitor and user of the Platform.

The purpose of this Privacy Notice (the “Notice”) is to explain to you how and when your personal data is processed when you access and use the Platform. Please read this Notice before using the Platform. If you have any questions regarding our privacy practices, contact us at our contact details provided below.

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## Contact Details

**Name:** WeWay Group Limited  
**Company number:** 13529680  
**Address:** 85 Great Portland Street,  
First Floor, London, England, W1W 7LT  
**Email address:** [hello@weway.com](mailto:hello@weway.com)

## What Personal Data is Processed

We collect and process the following personal data:

### Account Data

You may register for and maintain an account with the Platform, in which case you will provide us with certain personal data. Account Data includes:

- a. email address — mandatory;
- b. password — mandatory (stored by us in an encrypted form);
- c. login — mandatory (generated when you register for an account);
- d. date of birth — mandatory;
- e. digital wallet address and its balance — optional;
- f. history of transactions on the Platform — mandatory (processed when you transact on the Platform, e.g. make purchases, donations, etc.);
- g. photo — optional;
- h. links to social networks — optional.

Mandatory data is required in order to register and maintain your account with the Platform. Without such data we will not register an account with the Platform for you. Optional data is provided at your own discretion.

### Transaction Data

When you make a payment transaction within the Platform, we will process certain information that may be deemed personal data, which may include the following:

- a. **if paid in fiat:** transaction ID, amount, currency, time and date. We collect this information via the Platform when you make the transaction and/or we receive it from a third-party merchant solution integrated within the Platform;
- b. **if paid in virtual assets:** addresses of digital wallets involved in the transaction, transaction number and details, particular virtual assets used in the transaction, transaction amount. Depending on the circumstances of the transaction, we may (1) collect this information via the Platform when you make the transaction, (2) receive it from a third-party merchant solution integrated within the Platform, or (3) collect it from the respective blockchain network on which you transact.

When you make a fiat payment (i.e. a payment in any government-backed currency such as USD, RUB, or EUR), the transaction will be processed by a third-party merchant solution integrated within the

Platform. In such a case, you will provide your payment card details and other requested data to the respective third-party merchant solution provider. We do not receive or store such data. You should review the privacy documentation of the third-party merchant solution provider which you use to make fiat payments via the Platform.

Similarly, if a payment in virtual assets is processed by a third-party merchant solution integrated within the Platform, the respective third-party merchant solution provider will receive the relevant transaction details, such as addresses of digital wallets involved in the transaction, transaction number and details, particular virtual assets used in the transaction, transaction amount.

Please note that when you transact in virtual assets, details of your transaction will be recorded in and remain publicly available on the respective blockchain network, which is not operated by us. In this case, we will be deemed data controllers only with respect to the personal data stored on our servers.

### AML Data

If required under the applicable anti-money laundering and combating the terrorism financing (the "AML") legislation or our internal AML policies, we may request you to provide certain data which is necessary to verify your identity and/or source of funds that you use in transactions carried out on the Platform. The AML Data may include, but is not limited to:

- a. copy of your passport or another ID;
- b. the address of your residence;
- c. explanation of the source of your funds and relevant evidence;
- d. other data which is necessary to comply with the AML legislation or our internal AML policies.

All requests on the provision of AML Data are mandatory for you. If you fail to provide the requested AML Data, we will be required to terminate our relationship with you, including the Platform. We may from time to time engage a third party to collect and verify the AML Data, in which case such a third party will also process and store your AML Data and you should review the respective data protection documentation of such a third party.

### Marketing Data

Within the Platform, you may subscribe to receiving our marketing emails related to the Platform, its functionality, and our products and services. If you subscribe to receiving our marketing emails, we will process the email address that you provide to us.

You may unsubscribe from receiving marketing emails from us at any time by contacting us or clicking the unsubscribe button available at the bottom of each marketing email. In such a case, we will delete your email address from the respective marketing database.

Please note that administrative or service-related communications (security alerts, email verifications, maintenance notifications, etc.) are not considered marketing and such communications may not offer an option to unsubscribe.

### Communication Data

You may contact us either via the contact details provided on the Platform or via online chat that may be available on the Platform from time to time. When you contact us, you may provide us with certain additional personal information, such as your email address or name. Unless it is necessary for the purposes of your inquiry, we do not request you to provide any additional personal data.

### Automatically-Collected Data

Добавлено примечание (I1): Указываем, что вы не имеете доступ и не получаете данные, которые пользователь предоставляет мерчанту (card number, expiry date, cardholder name, CCV, etc)

Добавлено примечание (I2R1): Прошу сообщить, получаете ли вы эти данные или можете ли вы их получить по запросу к мерчанту

Добавлено примечание (I3): Сообщите, если вы планируете осуществлять маркетинговую рассылку пользователям, если они не подписались на нее самостоятельно

Добавлено примечание (I4R3): Прошу ответить на этот комментарий

Добавлено примечание (I5): На обновленном демо платформы увидели, что в рамках онлайн чата пользователь может залогиниться через Facebook или gmail. Уточните, пожалуйста, зачем это необходимо, как это работает и какие персональные данные вы получаете

When you access and use the Platform, certain data is collected automatically. We automatically collect the two following types of data:

- a. Technical Data; and
- b. Google Analytics Data;
- c. Facebook Pixel.

#### Technical Data

Technical Data includes the following:

- a. IP address;
- b. browser version;
- c. device operating system;
- d. access time.

Technical Data is necessary for the appropriate performance of the Platform. Without collecting such data, we would not be able to provide you with access to the Platform.

#### Google Analytics Data

We use Google Analytics to analyse the use of the Platform. Google Analytics gathers information about the use of the Platform by means of cookies. Cookies are a feature of the web browser software that allows web servers to recognise the device used to access the Platform. A cookie is a small text file that the Platform saves on your computer or mobile device when you visit the Platform. They allow the Platform to remember your actions and preferences over a period of time to improve our products and services.

Google Analytics is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland, and its affiliates including Google LLC, 1600, Amphitheatre Parkway, Mountain View, CA, 94043, USA.

The information gathered by Google Analytics includes the following: (1) IP address, (2) the type of device used, (3) the device operating system, (4) the browser used. After collecting the personal data, Google Analytics creates reports about the use of the Platform, which contain the aggregated information where we do not see any data pertaining to a particular person. In other words, we cannot identify you from the other visitors of the Platform. Please note that according to [Google Analytics documentation](#), the IP address is anonymised (masked), so neither we nor Google can identify the IP address of a particular visitor.

In addition to the above, with Google Analytics we collect certain information regarding the use of the Platform, for instance, when you clicked a certain button or made some input. This information is also aggregated and we cannot identify your actions from the actions of other Platform visitors.

To our knowledge, the data collected via Google Analytics is not anonymised (with the exception of the IP address) and will be transmitted to, processed and stored by Google in the United States. You can learn more about how Google processes personal data in [Google's privacy policy](#). Note that competent US state authorities may have access to the personal data collected via Google Analytics.

With respect to the personal data collected via Google Analytics Google acts as our data processor. However, Google may use this personal data for any of its own purposes, such as profiling and cross-platform tracking. In this case, Google acts as an independent data controller. You can learn more about Google Analytics, its purposes and functions [here](#).

Добавлено примечание (16): Проверьте информацию касательно использования Google Analytics. Сообщите, все ли корректно

To use Google Analytics, we will ask for your consent. When you visit the Platform, you are able to opt out from using Google Analytics. You also may object to the collection of personal data by Google Analytics from the Platform by downloading and installing a [browser add-on from Google](#).

### Facebook Pixel

This Platform uses the so-called Facebook Pixel of the social network [Facebook](#) for the following purposes:

- a. **Facebook (website) Custom Audiences.** We use the Facebook pixel for the remarketing purposes to be able to contact you again within 180 days. This allows us to display interest-based advertisements (Facebook Ads) to users of the Platform when they visit Facebook or other websites also using the Facebook Pixel tool. In this way, we pursue the interest in displaying advertisements that are of your interest in order to make the Platform or its content more interesting for you.
- b. **Facebook conversion.** We also use the Facebook Pixel to ensure that our Facebook Ads match the potential interest of users and are not irritating. With the Facebook Pixel, we can track the effectiveness of the Facebook Ads. This is necessary for statistical and market research purposes by seeing whether users were redirected to the Platform after clicking on the Facebook Ads.

Your browser automatically establishes a direct connection with the Facebook server as soon as you have agreed to the use of the Facebook Pixel cookies. Through the integration of the Facebook Pixel, Facebook receives the information that you used our Platform or clicked on an advertisement from us. If you are registered with Facebook (or its related products), Facebook can assign the visit to your respective account.

The Facebook Pixel tool is operated by Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, and its affiliates, including Facebook, Inc., 1 Hacker Way, Menlo Park, CA, USA.

The terms of the Facebook Pixel data processing by Facebook and us are established in the [Data Processing Terms](#). The transfer of data to Facebook is conducted pursuant to the [European Data Transfer Addendum](#). Facebook will transfer the data collected via the Facebook Pixel to the United States of America, which jurisdiction does not ensure the same level of data protection as in the UK, EEA, or Switzerland. Therefore, the transfer is conducted on the basis of the [Standard Contractual Clauses](#) adopted by the European Commission, which are incorporated in the [European Data Transfer Addendum](#).

Facebook processes the data received from the Facebook Pixel tool in accordance with their [Data Policy](#). Additional information regarding the Facebook Pixel may be found in the [Facebook Help Center](#).

Facebook are joint controllers (i.e. jointly responsible with us) for the following data processing activities in connection with the Facebook Pixel:

- a. creation of individualised or suitable ads, as well as for their optimization;
- b. delivery of commercial and transaction-related messages (e.g. via Messenger).

The following data processing activities are not covered by the joint controllership:

- a. the process that takes place after the collection and transmission is within the sole responsibility of Facebook;
- b. the preparation of reports and analyses in aggregated and anonymised form is carried out by Facebook as a processor and we act as a data controller.

Добавлено примечание (17): Проверьте информацию касательно использования Facebook Pixel. Сообщите, все ли корректно

We have concluded a [corresponding agreement with Facebook for joint controllership](#). This agreement defines the respective responsibilities for fulfilling the obligation under the data protection legislation with regard to joint controllership. In particular, we have agreed with Facebook that Facebook can be used as a contact point for the exercise of your data protection rights regarding the data collected by the Facebook Pixel tool.

In order to use the Facebook Pixel we will ask your consent when you access the Platform. The users of the Facebook social network may opt out from using the Facebook Pixel in the [Ad Preference center](#).

## Legal Basis and Purposes

Data	Legal Basis	Purpose
<b>Account Data</b>		
Email address	Performance of a contract with you	To identify and verify the user who created an account with the Platform
Password	Performance of a contract with you	To verify the user authorised to login the respective account with the Platform
Login	Performance of a contract with you	To identify users' accounts with the Platform
Date of birth	Legitimate interest	To verify whether you have sufficient age to use the Platform and participate in financial transactions
Wallet address and its balance	Legitimate interest	Our interest to provide you with a user-friendly interface and personalised account
Transactions history	Legitimate interest	Our interest to provide you with a user-friendly interface and personalised account
Photo	Legitimate interest	Our interest to provide you with a user-friendly interface and personalised account
Links to social networks	Legitimate interest	Our interest to provide you with a user-friendly interface and personalised account
<b>Transaction Data</b>		
Fiat transaction data	Performance of a contract with you	To process fiat transaction conducted via the Platform
Virtual asset transaction data	Performance of a contract with you	To process virtual asset transaction conducted via the Platform
<b>AML Data</b>		
AML Data	Compliance with a legal obligation	To prevent anti-money laundering and terrorism financing
<b>Marketing Data</b>		
Email address	Consent	To provide you with the news and updates related to the Platform, its functionality, and our products and services
<b>Communication Data</b>		

The information that you choose to provide to us	Legitimate interest	To assist you with your inquiry
<b>Automatically-Collected Data</b>		
Technical Data	Performance of a contract with you	It is not technically possible to use the Platform without providing such data
Google Analytics Data	Consent	To understand the usage of the Platform and improve it
Facebook Pixel	Consent	To retarget you with our advertisements and personalise them

## How Long Do We Store Your Data

Data	Storage Period
<b>Account Data</b>	
Email address	Until your account is deleted
Password	Until your account is deleted
Login (nickname)	Until your account is deleted
Date of birth	Until your account is deleted
Wallet address	Until your account is deleted or you choose to remove such data from your account
Transactions history	Until your account is deleted or you choose to remove your wallet address from your account
Photo	Until your account is deleted or you choose to remove such data from your account
Links to social networks	Until your account is deleted or you choose to remove such data from your account
<b>Transaction Data</b>	
Fiat transaction data	Six years following the end of the year when the transaction was made
Virtual asset transaction data	Six years following the end of the year when the transaction was made
<b>AML Data</b>	
AML Data	Five years beginning from the date when your account is deleted or the date when the relevant transaction is completed
<b>Marketing Data</b>	

**Добавлено примечание (I8):** Данные по транзакциям нельзя хранить бессрочно. Их нужно удалять через 6 лет после окончания года, когда произошла транзакция.

Например, если транзакция была в 2021 году, она должна быть удалена 1 января 2028 года

**Добавлено примечание (I9R8):** Прошу подтвердить, что вы ознакомились с этим комментарием

**Добавлено примечание (I10):** Если вы запрашивает данные по AML, их нужно удалить через 5 лет после (1) удаления аккаунта или (2) совершения транзакции, для которых собирались такие AML данные

**Добавлено примечание (I11R10):** Прошу подтвердить, что вы ознакомились с этим комментарием

Email address	Until you opt out from receiving our marketing emails
<b>Communication Data</b>	
The information that you choose to provide to us	Until your account is deleted
<b>Automatically-Collected Data</b>	
Technical Data	Until the end of the browsing session
Google Analytics Data	Storage period is described in the <a href="#">Google Analytics Documentation</a>
Facebook Pixel	Up to 180 days after last interaction with the Facebook Pixel tool

Добавлено примечание ((12)): Вместе с удалением аккаунта должны удаляться данные, связанные с обращением пользователя в поддержку

Добавлено примечание ((13R12)): Прошу подтвердить, что вы ознакомились с этим комментарием

Добавлено примечание ((14)): Согласно документации от Facebook, данные по Facebook Pixel хранятся в течение 180 дней после взаимодействия с пикселем. Подтвердите, пожалуйста

## Public Data

Information about certain actions taken by you on the Platform, for example the fact of your participation in specific Platform activities, may be made available to other users of the Platform. When you participate in Platform activities, you should check whether the relevant information will be made publicly available and do not participate if you do not want other users to see it.

Certain Account Data may also be available to other Platform users. Depending on your preferences, you may update your Account Data to manage what other users can see.

Note that information on your blockchain transactions are recorded into the public distributed ledger (blockchain) that we neither control nor operate, and such data can be viewed by any person without limitation. You should not transact on a blockchain unless you are comfortable with your transaction data being put into the public domain.

## Where and When Your Data is Transferred

We do not sell or rent out your personal data. However, we may share your personal data if it is reasonably necessary for the performance of our undertakings with you and our legitimate interest to maintain and develop the Platform and related products and services. In addition, you should consider the Public Data section above.

Your personal information is shared with the following categories of recipients:

- a. our affiliates, if necessary due to our corporate structure;
- b. our contractors, advisors, agents, and consultants, for example with our support team;
- c. operators of third-party solutions used within the Platform, e.g., payment gateways, merchants, etc.;
- d. AML service providers, if we engage a third party to request and verify your AML data. Please note that in such a case your respective data will be processed by such service providers. Their privacy statement will be provided to you at the point of data collection;

- e. age verification services, if we verify your age using such third-party service. Please note that in such a case your respective data will be processed by such service providers. Their privacy statement will be provided to you at the point of data collection;
- f. hosting providers, e.g., [Hetzner](#), [OVH](#), [AWS](#), etc.;
- g. courts and government institutions that may request access to your personal data.

Please note that we and the aforementioned recipients may be located in jurisdictions that do not ensure the same level of data protection as the country of your residence. We will endeavour to protect your personal data while it is processed, stored, and transferred. When we transfer personal data to a country that does not ensure sufficient level of data protection, we will use additional safeguards. As a general rule, we use [Standard Contractual Clauses](#). You may obtain a copy of the appropriate or suitable safeguards that we use by contacting us at the contact details available in this Notice.

## Your Rights

According to the applicable data protection legislation you have the following data protection rights:

**a. right to access:**

You may request us whether we process your personal data. When we process information about you, we will provide you with the following information:

- the purposes for collecting personal information about you;
- categories of personal information concerned;
- who receives your personal information or categories of such recipients;
- how long we are going to store the information about you and, if not possible, criteria to determine the storage period;
- the existence of the right to request from rectification or erasure of your personal data or restriction of processing of personal data concerning you or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- when your personal information was obtained not from you directly, the source where it came from;
- the existence of either profiling activities or automated decision-making based on your personal information. Where such activities are performed, we should also inform you about the importance, and expected consequences of them;

Please note that you may access your Account Data within the Platform.

**b. right to rectification:**

You have the right to correct inaccurate (for example, old or incorrect) personal information related to you.

Please note that you may personally correct certain personal information within the web-interface of the Platform. However, currently, you cannot change your email address or login, however, you may change your password at any time.

**c. right to erasure or the right to be forgotten:**

You have, under certain circumstances, the right to request the erasure of your personal information. Please note, that this right only applies to the data available at the time of request and is not applicable for the future data.

Request to the erasure of personal information is possible when:

- personal information is no longer needed for the purposes it was primarily collected or processed;
- when you have already withdrawn your consent for processing your personal data, and we do not have other legal ground to process it;
- when your personal data is processed under legitimate interest and you object to such legal ground, and there is no overriding legitimate interest to proceed to the processing of your personal data;
- your personal information was unlawfully processed;
- when your personal data has to be erased due to legal obligation.

In order to delete your account with the Platform and related data, please contact us or use the functionality that may be available within the Platform.

d. **right to restrict processing:**

You may request us to stop processing your personal information when:

- you have reasonable doubts that your information is accurate, and we are verifying the accuracy of such information;
- your personal information was unlawfully processed;
- the purpose of your personal information collection no longer exists, but you wish to store it longer to defend a legal claim.

Moreover, you may request us to stop processing your personal data while we are working on a rectification request or request to object to the processing of your personal information.

e. **right to data portability:**

You have the right to obtain from us and further reuse your personal data for your own purposes within other services. You also have the right to have your personal information transferred from one IT environment to another in a safe and secure way, when the following conditions apply:

- processing is based on your consent or needed for the contract performance;
- processing is made only electronically, without any paper-based files included.

f. **right to object:**

You have the right to object to the processing of your personal information at any time. This allows you to stop or prevent us from processing your personal information. This right is not absolute, but applies when one of the following conditions are met:

- your personal information is used for direct marketing purposes;
- the processing is based on our legitimate interest;
- we are performing tasks carried out for the public interest or by governmental authority;

- your personal information was processed for either research or statistical purposes.

Please note that you may unsubscribe from receiving marketing emails from us at any time by contacting us or clicking the unsubscribe button available at the bottom of each marketing email. In such a case, we will delete your email address from the respective marketing database.

g. **right not to be subject to automated decision making and profiling:**

Currently, we do not use your personal data for profiling or decisions made solely by automated means.

h. **right to lodge a complaint with a supervisory authority:**

You have a right to lodge a complaint with a competent data protection authority.

## **Personal Data of Minors**

The Platform is not intended for the use of children under 14 years old. We also do not knowingly market to, or solicit data from children under the age of 14. We do not knowingly process, collect, or use personal data of children under 14 years old, and in case we receive such data, we will erase it within a reasonable timeframe.

If you are a parent or legal guardian of a child under 14 who has become a user of the Platform, please contact us to have your child's account terminated and personal information deleted.

## **Updating this Notice**

We keep this Notice under regular review and may update it at any time. If we make any changes to this document, we will change the "Last Updated" date above. Please review this Notice regularly.

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[End of Document.]