

This page informs You of Marvli Payment (hereinafter — Company) policies regarding the collection, use, and disclosure of personal data when You use the Company's service and the choices You have associated with that data. The company's customer's private data security is the first priority for the Company. The company would like to highlight that the Company fully obeys all the laws and regulations. This privacy policy applies only to the Marvli Payment www.marvli.com website. By using the Marvli Payment website You agree with all the policies described on 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 the Company's staff operating outside the EEA who work for Marvli Payment or one of Marvli Payment's service providers. By using the Marvli Payment platform and services, You consent to Your Personal Data being transferred to other countries.

Types of information collected

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

Personal data

While using the Company's service, Marvli Payment asks You to provide the 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, the Company may collect information about You and Your business from third parties for the purposes of identification and verification as the Company is obliged to in accordance with legal causes.

Information from third parties to avoid the potential fraud

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

Transaction information

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

Usage Data

The 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 the 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 Marvli Payment for the operation to increase the quality of the service, and to provide general statistics

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and analysis regarding the use of the website as well as for checking unauthorized access.

Additional information

If any problems in the verification of information provided to Marvli Payment have occurred, the Company may ask for 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). Marvli Payment reserves the right to make an onsite visit to Your company.

Information collected during correspondence with customer service

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

Tracking & Cookies Data

The 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 the Company's website, Your browser, software versions and Your behaviour on the website.

Examples of Cookies Marvli Payment uses:

Session Cookies: to operate the Company's services;

Preference Cookies: to remember Your preferences and various settings;

Security Cookies: for security purposes.

Use of data

Marvli Payment uses collected data for various purposes:

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

Providing and maintaining services

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The processing of personal data is necessary for the purposes of providing and maintaining the services. The company collects the data to make correct, legal and secure services possible for all of its customers.

Platform and services improvement

Marvli Payment uses collected data to improve design, and 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 Marvli Payment is used to meet all the requirements of legal regulations.

Security reasons

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

Privacy policy changes notification

Marvli Payment 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 Marvli Payment is dealing with personal data.

Transfer of Data

Marvli Payment 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.

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

- To comply with a legal obligation;
- o To protect and defend the rights or property of Marvli Payment;
- o 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 the Services that we provide.

Service Providers

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Marvli Payment may employ third-party companies, group companies, including but not limited to Marvli Payment OÜ, Estonian registration number: 16338540, and individuals to facilitate the 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. Marvli Payment uses all the latest data protection tools with the highest standards in the market. The 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 and use the latest up-to-date browser while using Marvli Payment's platform.

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

The 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.

PCI Standards and Payments Security

We provide paid products and/or services on our Website. In that case, we use third-party services for payment processing (e.g. payment processors).

We do not retain, share, store or use personal information for any secondary purposes, and will exercise reasonable care to prevent disclosure or use of credit/debit card information. That information is provided directly to our third-party payment processors whose use of your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council.

We work to protect the security of your information during transmission by using the Secure Sockets Layer (SSL) software that encrypts information when you log in.

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 the 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 a crucial part of Marvli Payment's services. You also have the ability to avoid sharing information collected from the device You use while accessing Marvli Payment's platform (including but not limited to location and Usage Data) and used by the Company through the settings of the platform.

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Choices Relating to Cookies

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

Choices Relating to Communication

The company may send You advertisements about the services and products including but not limited to emails, text messages and push notifications.

The company may send You advertisements about the services and products including but not limited to emails, text messages and push notifications. You may refuse or change the 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 Marvli Payment. If You click on the link of a third-party resource, You will be redirected to the website of this third-party resource. Marvli Payment strongly recommends You 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, you can change it for Your account online or by contacting Marvli Payment.

Children's Privacy

Marvli Payment services do not address anyone under the age of 18 (hereinafter Children). Marvli Payment 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 have provided the Company with Personal Data, please contact Marvli Payment.

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. Marvli Payment 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 Marvli Payment holds about You and if You want it to be removed from Marvli Payment'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 the deletion of Your Personal Data directly within Your account settings
 section. If You are unable to perform these actions Yourself, please contact Marvli Payment to assist
 You.
- o The right of rectification. You have the right to have Your information rectified if that information is

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inaccurate or incomplete.

- o The right to object. You have the right to object to the Company's processing of Your Personal Data.
- The right of restriction. You have the right to request that the Company restrict 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 the 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 when Marvli Payment relies 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 the Company by email welcome@marvli.com

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