

Privacy Statement of Cash Friday B.V. (acting as "Monflo")

This Privacy Statement informs you about the processing of your personal data when you visit our website.

Controller

Monflo is the controller of the processing operations described in this Privacy Statement, except where otherwise indicated for a specific processing operation.

The location and contact details of Monflo are:

Cash Friday B.V.
Hoofdstraat 4 A
7311 KA Apeldoorn
Chamber of Commerce registration number: 86115294
www.monflo.com
privacy@monflo.com

Purposes of the processing

If you use the service, Monflo may process your personal data for the following purposes:

- To allow your device to load and display our website;
- To secure our website, your personal data and/or our property;
- To be able to communicate with you, if you filled in a contact request;
- To send you updates and other information about our services, if you registered for our mailing list;
- To examine how our service is being used, so that we can make improvements where necessary;
- In order to be able to transfer our company (including goodwill / customer base) one day, as part of a merger, asset purchase agreement, or relaunch.

Legal grounds for processing and retention periods

Processing operations that are necessary to enable the use of the website

Listed below are the personal data that we must process in order to enable the technical functionality of our website. The processing of these categories of data is based on article 6 (1) under (b) of the GDPR.

- Name
- Address
- Town/City
- E-mail address
- Phone Number

Allowing us to process these personal data is a prerequisite for using our website, within the meaning of in Article 13 (2) (e) of the GDPR. We cannot provide our website to you without processing these personal data.

The retention period for personal data that we process on this basis is:

one (1) year after the termination of your agreement with us. Your agreement with us ends when you close your Web3 IBAN account or in case you are not an account holder us you revoke your consent to be listed in our contact lists in case you are not a customer.

After termination of the contract, we will retain your personal data for one year for the purpose of reactivating your account, if you so wish.

In some cases, we may retain the personal data that we mentioned above for a longer period. This is the case if we have reason to believe that retaining records relating to the use of our website is necessary for the protection of our legal position in case of a dispute, or if we are required by law to retain certain data for a longer period. For more information about longer retention of personal data in such cases, please refer to the following paragraphs of this privacy statement.

Processing operations that are necessary for a legitimate interest

- **Personal data necessary to analyze the use of our website, in order to make improvements to our website** where needed:
 - Name
 - Address
 - Town/City
 - E-mail address
 - Phone Number

We use Google Analytics to analyze the use of our website. For the type of analyzing that we do on the basis of our legitimate interest, we have selected privacy friendly settings in Google Analytics. This means that in our configuration of Google Analytics, we have disabled the collection of most types of personal data. Insofar as any personal data is collected, it is aggregated, masked or removed before any information is sent over to Google in the USA, to ensure that Google only receives information that is no longer traceable to you.

To read more about how Google Analytics works, please see [this information overview by Google](#). To read more about the way Google handles the resulting analytical information that is shared with them, please see [Google's data protection policy](#).

- **Data relating to the use of our website, if we have reason to believe that this data may be important to our legal position**

If we notice that our website has been misused or suffered any other type of (security) incident, we may collect and retain data (including personal data) about the incident(s), in order to research and document what happened. We may do this for our own information and for our burden of proof in the context of a dispute or impending dispute, or if the personal data may otherwise be necessary for the protection of our legal position in relation to the incident(s).

The retention period for these data is: until the dispute or impending dispute has been resolved.

Processing operations that we do on the basis of your consent

These are the personal data that we only process if you give us permission to do so:

- contact data to be used for marketing emails
- data collected by analytical cookies that *do* share personal data with the analytics tool provider; e.g. Google Analytics data that is not anonymized before sending it over to Google; Google Consent Manager can apparently be integrated with Cookiebot to ensure that such non-anonymous data is not shared with Google unless consent has been given

The retention period for these data is: until you withdraw your consent.

Sharing of personal data

We may share your personal data with third parties in the following cases:

Sharing with processors

For some parts of our business activities, we use service providers outside our own organization. If these service providers process personal data for us, they are our "processors". In that case, we conclude a processor's agreement with them, as referred to in article 28 paragraph 3 AVG.

Sharing on the basis of a legitimate interest

▪ *Security and our legal interests*

We may share your personal data with third parties such as our lawyer and/or a bailiff, a (forensic) accountant, detective agency, cyber security experts or other types of researchers and/or the police if this is reasonably necessary:

- to protect rights, property or the safety of our organization, our users, our employees or the public;
- to protect our organization and our users from fraudulent or otherwise unlawful, inappropriate or offensive use of our website;
- to respond to a (current or imminent) liability or other (current or imminent) legal consequences.

If we share your personal data on this basis, we will inform you about it if we can. We cannot inform you about sharing your personal data if doing so might interfere with the purpose and effectiveness of the investigation or other measures for which we have to share the data.

▪ *Sale or merger of our company*

We may share personal data that we process with third parties, if we intend to sell our company or a division within our company (either as part of a relaunch or otherwise), or if our company intends to merge with another. In the preparatory phase of the sale or merger, we may share personal data with

potential buyers or merger partners. When the company is actually transferred or merged, we will share personal data with the final buyer or merger partner.

In the preparatory phase of the sale or merger, we will anonymize the personal data that are part of our business information as much as possible. Upon actual transfer or merger of our business, personal data may be shared in full.

We will not sell any personal data separately - outside of the context of a relaunch, company sale or merger - to an organization that will use such personal data for activities that are very different from ours.

If we intend to transfer your personal data to a third party in the course of a company sale, merger or relaunch, we will inform you about this as soon as we can do so without disrupting the preparatory phase of the sale, merger or relaunch.

If we share your personal data with a third party on the basis of a legitimate interest, and the third party is not already appropriately bound to confidentiality by law, we will conclude a confidentiality agreement with the third party before we share the personal data.

Automatic decision-making and/or profiling

You can use our website without being subjected to automated decision-making or profiling. Inasmuch as our website might offer personalized content on the basis of a profile of your interests, this is only done on the basis of your explicit consent.

Transfer of personal data outside the European Economic Area (EEA)

To the greatest extent possible, we process personal data within the EEA. If we have to process personal data outside the EEA, we will try to do this in a country that offers an adequate level of personal data protection within the meaning of Article 45 GDPR.

If we would ever need to process personal data in a country that is not covered by an adequacy decision within the meaning of Article 45 GDPR, we will make use of standard contractual clauses made or ratified by the European Commission (within the meaning of Article 46 paragraph 2 under c and d), to ensure that our processor offers adequate safeguards for your privacy.

Security of your personal data

Monflo takes the appropriate technical and organizational measures to secure your personal data. We will ensure that our measures are appropriately updated to remain in line with the state of the art regarding data security. Currently, we apply (at least) the following types of security measures:

- We have taken physical measures in our business premises to ensure that unauthorized persons cannot access our documents, workstations and servers.
- Our company regulations contain behavioral rules to prevent unauthorized access to and/or loss of personal data.
- All our employees are contractually bound to secrecy.

- We use SSL (Secure Socket Layer) technology where appropriate to encrypt sensitive information and personal data (such as account passwords and other identifying information) during transmission.
- Sensitive information is stored in encrypted form, in so far as is reasonably possible within our company's activities.
- Back-ups of personal data are made to the reasonably possible extent.
- Vulnerabilities in our software are always addressed as quickly as possible.

Insofar as we use the services of third parties, who act on our behalf as processors of personal data, these processors are contractually obliged to take appropriate technical and organizational measures to protect the personal data.

Although we do our best to ensure good security, we must point out that absolute security when storing personal data and sending data over the Internet can never be guaranteed.

Your rights

For all processing operations that we carry out on the basis of your consent, you have the right to withdraw your consent at any time. We will then discontinue the processing activities in question. Note that the processing activities that previously took place on the basis of your granted consent will not become unlawful with retroactive effect.

You have the right to object against processing operations that we carry out on the basis of a legitimate interest, on grounds relating to your particular situation.

In all cases, you have the right to request access to the personal data we process about you, the right to have inaccuracies in your personal data corrected ('right to rectification') and the right to have your personal data erased if their processing is not/no longer based on a valid legal ground.

If there is no longer a valid legal ground for our processing of your personal data, but you do not want to have the data removed immediately, you can also make use of the right to 'restriction of processing'. Restriction of processing means that we will retain your personal data for you, but will not use it for any other purpose.

In some cases, you may have the right to data portability. Data portability means that you can receive your personal data from us in a structured, commonly used and machine-readable format, or have it transferred to a new service provider (where technically feasible). This right only applies to personal data that you have provided directly to us and that we process on the basis of your consent, or because it is necessary for the performance of our contract with you.

To exercise your rights, please contact us using the contact details stated at the end of this Privacy Statement.

Your right to lodge a formal complaint

If you are dissatisfied with anything related to our processing of your personal data, please discuss it with us so that we can try to resolve it. You can contact us for this purpose using the contact details at the end of this privacy statement.

You also have the right to lodge a complaint with the Autoriteit Persoonsgegevens. Please refer to the website of the [Autoriteit Persoonsgegevens](#).

Contact

For questions or comments on our processing of personal data, or to exercise your rights, please contact us at:

Monflo

privacy@monflo.com