



REALIVOBIS
IDEAS THAT WORK

PRIVACY POLICY

REALIVOBIS

REALIVOBIS LTD
HE 426863

PRIVACY POLICY

Last updated May 2023

GoStatim is the Trade Name of Realivobis LTD ("the Company", "Realivobis", "we"). Realivobis wishes to inform its clients and other data subjects (i.e. guarantors) ("you") about how the Company processes their personal data as well as of their data subject rights in accordance with Data Protection Law, including but not limited to the Cyprus Data Protection Law 125(I)2018, the European General Data Protection Regulation 2016/679 ("GDPR") and the Cyprus legislation governing the electronic communications and postal services N.112 (I) 2004.

Please take the time to read this Privacy Policy.

Definitions:

1. The terms "personal data", "data" and "personal information" refer to any information relating to you that identifies or may identify you, such as your name or contact details.
2. The term "processing" refers collectively to actions such as the collection, retention, use, disclosure, transfer, deletion, or destruction of personal data.

WHO IS RESPONSIBLE FOR DATA PROCESSING?

Realivobis is a company established in accordance with the laws and regulations of the Republic of Cyprus, with company registration no. HE426863 and with a registered address at Georgiou Theotoki 4A 4004, Limassol.

Realivobis is the data controller of your personal data, meaning that we are responsible for determining the purpose and means of processing as described in this Privacy Policy.

HOW THE COMPANY COLLECTS AND PROCESS YOUR PERSONAL DATA?

(a) Information you or your representatives or third parties provide: The Company collects information about you via the online application forms and/or other relevant forms and/or agreements.

(b) Information processed by third parties entities providing services and products for Know-Your-Customer (KYC) and due diligence purposes etc.

WHAT TYPES OF PERSONAL DATA DOES THE COMPANY COLLECT AND PROCESS?

The personal data that each registered user must provide to submit and/or complete any order through the app are as follows:

- Full name
- Postal address
- Contact Phone
- E-mail
- Date of birth
- Recent valid passport or ID photo (both sides of ID)
- Take a photo of a face (via webcam or mobile phone camera (selfie))
- IBAN number
- Copy of recent pay slip*
- Copy of recent proof of address (e.g., water or electricity bill showing the user's name and address in full) *.

* All documents must be dated within the last six months from the date of account creation on the app.

LEGAL BASIS AND PURPOSES FOR PROCESSING YOUR PERSONAL DATA

(a) *The necessity to perform our contractual obligations:* The Company collects and processes your personal data for 1) identification and application evaluation purposes and 2) carrying out the provision of the Company's services and other obligations to you in accordance with the Company's Terms and Conditions, and 3) passing the information to our third-party partner responsible for granting a loan or carrying out a credit risk assessment, Ellinas Finance Public Company Ltd, with company registration no. HE52585 and with a registered address at Theotoki 6 1055, Nicosia.

(b) *For safeguarding our legitimate interests:* Personal data are also processed for reasons pertaining to business and/or commercial interests such as 1) verifying your identity to protect you against fraud and to confirm your eligibility to use our products and services; 2) pursuing and/or defending claims in judicial and/or regulatory proceedings; 4) ensuring the best possible quality and security of our operations, 5) ensuring the smooth and secure operation of our network, IT operations, and facilities; 6) protecting our Intellectual Property rights; 6) to protect the Company's customers, its employees as well as the Company's property.

(c) *Consent.* We may be required to obtain your specific consent to process your personal data for various legitimate reasons, such as a) for direct marketing or b) to allow us to use your personal data to search or disclose personal data related to your financial behavior to credit reference companies to protect commercial credit and the consolidation of trading activities.

DISCLOSURE / SHARING OF PERSONAL DATA

In addition to any disclosure of personal data to authorities/bodies/institutions as required by applicable law, we may appoint subcontractors who process personal data on our behalf ("data processors"), based on our legitimate business interest as required to deliver and protect our services, such as IT systems or software providers, IT support services, external advisors, and consultants.

We conduct an appropriate level of due diligence and put in place contractual documentation in relation to any processors to ensure that they process personal data securely, in confidence, and according to applicable law.

SECURITY AND CONFIDENTIALITY

Your personal data are only processed by the Company's units and/or persons that are authorized to process them provided that such processes are lawful and carried out as described in this Policy. In addition, the Company adopts and is committed to improving all technical and organizational measures that are in place so that the confidentiality, integrity, and availability of the processing of personal data are always ensured.

The Company is committed to safeguarding the privacy of the personal data and/or information you share with the Company and/or with its employees and/or agents and/or associates. The Company applies procedures and measures to safeguard and provide reasonable protection of your personal data against loss, misuse, unauthorized disclosure, and alteration. The data processing is conducted solely by people who are under the control of the Company, and only under its guidance.

WHAT ARE YOUR RIGHTS FOR THE PROTECTION OF YOUR DATA

You have the following rights concerning the data the Company controls and processes:

(a) to be informed about how we use your personal information and your rights. This is why we are providing you with the information in this Privacy Policy Statement (Right to be informed).

(b) to be aware of the categories of your personal data that the Company maintains and processes, their origin, processing purposes, and recipients of your personal data, and to receive a copy of your personal data processed by the Company. (Right of access).

(c) to request correction of your personal data that the Company holds about you for such data to be complete and accurate (Right of rectification), by producing any necessary document based on which the need for correction or completion arises from.

(d) to ask for restriction of the processing of your data (right to restrict processing). This right can be exercised where (i) you contest the accuracy of such data; (ii) the processing is unlawful but you request that we do not delete your personal data; (iii) we no longer need to process such data but you request that we retain them for reasons connected with legal claims; (iv) you have objected to us using your personal data but you are awaiting our confirmation as to whether we have legitimate grounds to continue processing such data.

(e) to object to any further processing of your personal data the Company keeps and processes based on our legitimate interests (right to object). Should you exercise this right, we will no longer process such data unless we are able to demonstrate legitimate grounds for the processing.

(f) to ask for the deletion of your personal data from the Company's systems and files (right to be forgotten). This right can be exercised where:

(g) not to be subject to a decision based solely on automated processing (including profiling) (right in relation to automated decision making and profiling)

(i) to withdraw your consent to the collection and processing of your personal data (right to withdraw consent). In such a case, the withdrawal of the consent does not affect the legality of the data processed prior to the revocation.

Please note that your rights applicability depends on the legal basis on which the Company relies in each case. Your rights are subject to exceptions (i.e., the rights are not absolute) and therefore may not be met, in whole or partly, if they concern data necessary for the establishment, exercise, or defense of legal claims, or as otherwise permitted by law, irrespective of the source of their collection.

You also have the right to make a complaint at any time to the Data Protection Commissioner Office, the Cyprus supervisory authority for data protection issues (<http://www.dataprotection.gov.cy>).

If you want to exercise any of these rights, then please contact us by e-mail at info@realivobis.com. We will take all appropriate steps to respond within the legal timeframe, that is (1) one month from its submission or additional 2 months in the case of receiving an excessive request in which case we will keep in touch and be informed about the progress and status of your request.

You will not have to pay a fee to access your personal information (or to exercise any of the above-mentioned rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is a necessary security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

CHANGES TO THIS PRIVACY POLICY

The Company may at any time modify any or all the Privacy Policy contained herein, and users will be notified three (3) days prior to the effective date of the new terms and conditions. Users who accept and/or continue to use the website and application will be deemed to have been informed, accepted, and bound by the changes.

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If you have any questions about this Privacy Policy or want to exercise your rights, please contact us by email: info@realivobis.com