

Privacy Notice

1. **Effective date: July,1 2025.**
2. **Important information and who we are**

Introduction

This privacy notice gives you information about how XONO Limited collects, protects and uses your personal data through your use of this website, including any data you may provide when you register with us, in accordance with the Data Protection Act 2004 (the "**DPA**") and the Gibraltar General Data Protection Regulation (as defined in the DPA (the "**Gibraltar GDPR**"). It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Controller

XONO Limited ("**XONO**", "**we**", "**us**" or "**our**" in this privacy notice) is a "data controller". This means that we are responsible for deciding how we hold and use certain personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

If you have any questions about this privacy policy, including any requests to exercise your legal rights (paragraph 10), please contact us using the information set out in the contact details section (paragraph 12).

3. The types of personal data we collect about you

Personal data means any information about an individual from which that person can be identified.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, last name, any previous names, username or similar identifier, title, date of birth, photographs and Government Issued ID documents (such as driving licences, passports, etc), address, including country of residence and proof of address documents (such as Utility Bills). This includes other information that you disclose when communicating with us.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account, payment card details, employment status, salary, financial information, pay records and information we obtain from third parties, such as information that we obtain when verifying details supplied by you and information collected from publicly available sources. Such third parties may include fraud prevention agencies, banks, merchants and credit reference agencies.
- **Transaction Data** includes details about payments to and from you.

- **Technical Data** includes internet protocol (IP) address, cookies, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, device ID and other technology on the devices you use to access this website.
- **Profile Data** includes your username , preferences, feedback and survey responses, location of employment or workplace.
- **Usage Data** includes information about how you interact with and use our website, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share aggregated data such as statistical or demographic data which is not personal data as it does not directly (or indirectly) reveal your identity. For example, we may aggregate individuals' Usage Data to calculate the percentage of users accessing a specific website feature in order to analyse general trends in how users are interacting with our website to help improve the website and our service.

4. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Your interactions with us.** You may give us your personal data by completing our online forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
 - apply for our services;
 - create an account/register with us;
 - subscribe to our service;
 - request marketing to be sent to you; or
 - give us feedback or contact us.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **Third parties or publicly available sources.** We will receive personal data about you from various third parties and public sources as set out below:
 - Technical Data is collected from the following parties:
 - analytics providers such as Google;
 - advertising networks; and
 - search information providers.
 - Contact, Financial and Transaction Data is collected from providers of technical, payment and delivery services.
 - Identity and Contact Data is collected from data brokers or aggregators.

- Identity and Contact Data is collected from publicly available sources.

5. How we use your personal data

Legal basis

The law requires us to have a legal basis for collecting and using your personal data. We rely on one or more of the following legal bases:

- **Performance of a contract with you:** To provide you with the services that you have applied for and to perform our contractual obligations to you under our contract.
- **Legitimate interests:** We may use your personal data where it is necessary to conduct our business and pursue our legitimate interests, for example to prevent fraud and enable us to give you the best and most secure customer experience. We make sure we consider and balance any potential impact on you and your rights (both positive and negative) before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Legal obligation:** We may use your personal data where it is necessary for compliance with our obligations under laws or regulations that we are subject to. For example, we will process your personal data in connection with our requirements to obtain and keep client due diligence in accordance with anti-money laundering laws.
- **Consent:** We rely on consent only in certain circumstances. Where we seek to rely on your consent to process any part of your personal data, we will ensure that you have been fully informed of the reasons that we need to process your personal data in that way in order to afford you the opportunity to consent (or not) to the relevant processing.

Purposes for which we will use your personal data

We have set out below, in a table format, a description of some of the ways we plan to use the various categories of your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Please note that this list is illustrative and not intended to be exhaustive.

Purpose/Use	Type of data	Legal basis
To register you as a new customer	(a) Identity (b) Contact	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation
To process and deliver services to you including: (a) Manage payments, fees and charges (b) give you statements and other information about your account or our relationship	(a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) (c) Necessary to comply with a legal obligation

<p>(c) provide our services to you</p> <p>(d) Collect and recover money owed to us</p>		
<p>To manage our relationship with you which will include:</p> <p>(a) Notifying you about changes to our terms or privacy policy</p> <p>(b) Dealing with your requests, complaints and queries</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Marketing and Communications</p>	<p>(a) Performance of a contract with you</p> <p>(b) Necessary to comply with a legal obligation</p> <p>(c) Necessary for our legitimate interests (to keep our records updated and manage our relationship with you)</p>
<p>To administer and protect our business interests and strategies and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p>	<p>(a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)</p> <p>(b) Necessary to comply with a legal obligation</p>
<p>To deliver relevant website content and online advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Profile</p> <p>(d) Usage</p> <p>(e) Marketing and Communications</p> <p>(f) Technical</p>	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, customer relationships and experiences and to measure the effectiveness of our communications and marketing</p>	<p>(a) Technical</p> <p>(b) Usage</p>	<p>Necessary for our legitimate interests (to define types of customers for our services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To send you relevant marketing communications and make personalised suggestions and recommendations to you about goods or services that may be of interest to you based on your Profile Data</p>	<p>(a) Identity</p> <p>(b) Contact</p> <p>(c) Technical</p> <p>(d) Usage</p> <p>(e) Profile</p> <p>(f) Marketing and Communications</p>	<p>Consent, having obtained your prior consent to receiving direct marketing communications</p>

<p>To share your information with our partners and service providers</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction</p>	<p>(a) Performance of a contract with you (b) Necessary for our legitimate interests (in using third parties to provide some services for us or on our behalf)</p>
<p>To meet our regulatory compliance and reporting obligations and to prevent, detect, investigate and prosecute fraud and alleged fraud, money laundering and other crimes.</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction</p>	<p>(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to ensure regulatory compliance)</p>
<p>To assess any application you make, including carrying out fraud, money laundering, identity, sanctions screening and any other regulatory checks.</p>	<p>(a) Identity (b) Contact (c) Financial (d) Transaction</p>	<p>(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to ensure regulatory compliance)</p>
<p>To transfer your information to or share it with any third party to whom your account has been or may be transferred following a restructure, sale or acquisition of XONO or any group company</p>	<p>(a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction</p>	<p>(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (in restructuring or selling part or the whole of our business)</p>
<p>To share your information with relevant tax authorities, credit reference agencies, fraud prevention agencies, and regulators and authorities</p>	<p>(a) Identity (b) Contact (c) Profile (d) Financial (e) Transaction</p>	<p>(a) Necessary to comply with a legal obligation (b) Necessary for our legitimate interests (to ensure regulatory compliance, in performing certain credit checks so that we can make responsible business decisions, in assisting with the prevention and detection of fraud and other crime and in assisting overseas regulators, who monitor financial institutions to ensure that they comply the law and regulations)</p>

Direct marketing

During the registration process on our website when your personal data is collected, you will be asked to indicate your preferences for receiving direct marketing communications from XONO via email.

We may also analyse your Identity, Contact, Technical, Usage and Profile Data to form a view on which services and offers may be of interest to you so that we can then send you relevant marketing communications.

Third-party marketing

We will get your express consent before we share your personal data with any third party for their own direct marketing purposes.

Opting out of marketing

You can ask to stop sending you marketing communications at any time by following the opt-out links within any marketing communication sent to you or by contacting us hello@payrall.io.

If you opt out of receiving marketing communications, you will still receive service-related communications that are essential for administrative or customer service purposes.

Cookies

For more information about the cookies we use and how to change your cookie preferences, please contact us hello@payrall.io.

6. Disclosures of your personal data

We may share your personal data where necessary with the parties set out below for the purposes set out in the table Purposes for which we will use your personal data above.

- To any member of our group of companies (this means our subsidiaries, sister companies, our ultimate holding company and all its subsidiaries).
- To our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.
- To one or more of those selected third party suppliers of services identified on our website for the purpose of enabling them to contact you so that they can offer, market and sell to you relevant goods and/or services. Each such third party will act as a data controller in relation to the enquiry data that we supply to it; and upon contacting you, each such third party will supply to you a copy of its own privacy policy, which will govern that third party's use of your personal data.
- Where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person. We may also disclose your personal data where such disclosure is necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure.

- The recipient of your personal data may also include any revenue service or tax authority for e.g. HMRC or for Common Reporting Standards and FATCA reporting to US IRS. In addition to this, fraud prevention agencies and law enforcement agencies may also use your personal data to prevent fraud and money-laundering and to verify your identity.
- Third parties to whom we may choose to sell, transfer or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy policy.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. International transfers

We may transfer your personal data to service providers that carry out certain functions on our behalf. This may involve transferring personal data outside Gibraltar to countries which have laws that do not provide the same level of data protection as Gibraltar law.

We may transfer personal data to service providers based within the EEA, provided always that there is a legal basis for the transfer.

We will only transfer your personal data out of Gibraltar to third-parties based outside of the EEA, where the following safeguards are in place:

- the third-party recipient is based in a jurisdiction where an “adequacy decision” has been made by the GRA. An “adequacy decision” is a decision of the Information Commissioner in which it confirms it is satisfied that the laws of that jurisdiction would afford data subjects an adequate level of protection to their personal data.
- in circumstances where the third-party recipient is not based in a jurisdiction which is the subject of an “adequacy decision”, we will ensure that we have entered into a binding agreement with such third-party recipient whereby we apply contractual terms which give the transferred personal data the same protection as it has in Gibraltar on that third-party.
- where we have received your fully informed consent in respect of the proposed transfer.

8. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have

a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

9. Data retention

How long will we use your personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

By law we have to keep basic information about our customers (including Contact, Identity, Financial and Transaction Data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see paragraph 9 below for further information.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

10. Your legal rights

You have a number of rights under data protection laws in relation to your personal data.

You have the right to:

- **Request access to your personal data (commonly known as a "subject access request").** This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- **Request erasure of your personal data in certain circumstances.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

- **Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) as the legal basis for that particular use of your data (including carrying out profiling based on our legitimate interests).** In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your right to object.
- **You also have the absolute right to object** any time to the processing of your personal data for direct marketing purposes (see paragraph 4 for details of how to object to receiving direct marketing communications).
- **Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Withdraw consent** at any time where we are relying on consent to process your personal data (see the table in paragraph 4 for details of when we rely on your consent as the legal basis for using your data). However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in one of the following scenarios:
 - If you want us to establish the data's accuracy;
 - Where our use of the data is unlawful but you do not want us to erase it;
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

If you wish to exercise any of the rights set out above, please contact us hello@payrall.io.

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure

to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

11. Special Category Data

In general, we will not collect any sensitive (special category data) about you unless we have a lawful reason to do so. In the event that we are required to obtain special category data we will provide you with the rationale for our request and the purpose. We need your consent to obtain and hold special category data about you, however, if consent is not given, we may not be able to provide services to you or to enter into an agreement with you

12. Contact details

If you have any questions about this privacy policy or about the use of your personal data or you want to exercise your privacy rights, please contact us in the following ways:

- Email address: hello@payrall.io

13. Complaints

You have the right to make a complaint at any time to Gibraltar's regulator for data protection issues, the Gibraltar Regulatory Authority (the "GRA") (www.gra.gi). We would, however, appreciate the chance to deal with your concerns before you approach the GRA so please contact us in the first instance.

14. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on July, 1 2025.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us, for example a new address or email address.

15. Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.