



Introduction

Welcome to Axecraft Technologies Limited's ("Axecraft") privacy policy.

Axecraft provides a service that allows businesses to effortlessly manage financial transactions and streamline payments with our cutting-edge API solution and web platform. Axecraft respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit Axecraft's website and/or log into our app (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

This privacy policy is provided in a layered format so you can click through to the specific areas set out below. Alternatively, you can download a pdf version of the policy [here](#). Please also use the Glossary to understand the meaning of some of the terms used in this privacy policy.

1. Important information and who we are

Purpose of this privacy policy

At Axecraft, your privacy is highly valued and we exercise all reasonable endeavors to protect your Personal Information in line with this Privacy Policy. "Personal information" refers to any information from which your identity could reasonably be ascertained. Axecraft will only collect and use your personal information in accordance with this Privacy Policy and the terms of your agreements with Axecraft.

As a Customer, you accept this Privacy Policy when you sign up for, access, or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services.

At Axecraft, your privacy is highly valued and we exercise all reasonable endeavors to protect your personal information. "Personal information" refers to any information from which your identity could reasonably be ascertained. Axecraft will only collect and use your personal information in accordance with this Privacy Policy and the terms of your agreements with Axecraft.

This Privacy Policy explains :

- The type of personal information we collect
- How we collect personal information
- How we use cookies
- How we use your personal information



- Disclosure of personal information
- Security of your personal information
- Global companyInternational Transfers
- Data Retention
- Your legal rights
- Additional matters relating to personal information

This privacy policy aims to give you information on how Axecraft collects and processes your personal data through your use of Axecraft on this website or its app, including any data you may provide through this website when you sign up to use Axecraft services. The Axecraft service is not intended for children, and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

Axecraft is the controller and responsible for your personal data (collectively referred to as Axecraft, "we", "us" or "our" in this privacy policy). We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise, your legal rights, please contact the DPO using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our DPO via email address: legal@axecraft.co.

2. The Type Of Personal Information We Collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). In order to enable us to open and operate an account or to generally provide you with our products and services and comply with laws and regulations, we may need to and/or may be required to collect, record, hold, use, disclose and store (i.e. "process") personal information and financial information about you, including but not limited to :

- Identity Data includes first name, maiden name, last name, username or similar identifier, means of identification, title, date of birth and gender.



- Contact Data includes residential address, email address and telephone numbers.
- Financial Data includes bank account information.
- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- Profile Data includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you 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 for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you.

3. How We Collect Personal Information

We obtain personal information in various ways, including but not limited to :

- when you register an account with Axecraft through our website;
- through your relationship with us, for example information provided by you when using our products or services, when taking part in customer surveys, competitions and promotions;
- from an analysis of the way you use and manage your account with us, from the transactions you make and from the payments which are made to/from your account;
- when you contact Axecraft through various methods such as application forms, email, letters and telephone calls. If you contact us or we contact you using telephone, we may monitor or record the phone call for quality assurance, training and security purposes;



- when we obtain any data and information from third parties;
- from such other sources in respect of which you have given your consent to disclose information relating to you and/or where not otherwise restricted.

4. How We Use Cookies

Cookies help us give you the best experience of using our site. In this policy we use the term "cookies" to refer to cookies and other similar technologies.

Cookies are small data files that we or companies we work with may place on your computer or other device when you visit our website. They allow us to remember your actions or preferences over time.

We use cookies to collect data that helps us to :

- track site usage and browsing behaviour;
- allow you to log-in to your account and navigate through the website;
- monitor the effectiveness of our promotions and advertising; and
- mitigate risk, enhance security and help prevent fraud.

We use both session and persistent cookies. Session cookies are deleted when you close down your browser, while persistent cookies remain on your device until they expire or you delete them. Persistent cookies allow us to remember things about you when you visit our website again.

To help us monitor the effectiveness of our promotions and advertising, we may provide site usage data obtained through the use of cookies to select third-party service providers. Any data provided by us to these third parties will be non-personally identifiable.

By signing-up for an account with Axecraft, or continuing to use our website, you agree to our use of cookies as set out in this policy. You may decline our cookies if your browser or browser add-on permits, but doing so may interfere with your use of Axecraft's services. For information on how to delete or reject cookies, you can consult the "help" function within your browser, or visit www.allaboutcookies.org, where you will also find more information about cookies generally.

5. How We Use Your Personal Information

Other than as stated above, we may use your personal information for one or more of the following purposes :



- to verify your account in accordance with Know Your Customer (KYC) and Anti-Money Laundering (AML) regulations;
- to assess your application for our products and services;
- to manage and maintain your account with us;
- to better manage our business and your relationship with us;
- to notify you about benefits and changes to the features of products and services;
- to administer offers, competitions and promotions;
- to respond to your enquiries and complaints and to generally resolve disputes;
- to update, consolidate and improve the accuracy of our records;
- to produce data, reports and statistics which have been anonymised or aggregated in a manner that does not identify you as an individual;
- to conduct research for analytical purposes including but not limited to data mining and analysis of your transactions with us;
- to meet the disclosure requirements of any law binding on Axecraft;
- for audit, compliance and risk management purposes;
- to assess financial and insurance risks;
- to conduct anti-money laundering checks; for crime detection, prevention and prosecution; to comply with any sanction requirements;
- for any other purpose that is required or permitted by any law, regulations, guidelines or relevant regulatory authorities.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us



Change of purpose

We will only use your personal data for the purposes for which we collected it unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us via our support channels.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Please be assured that we will ask for your consent before using your personal information for a purpose other than those set out in this Privacy Policy and in the terms in your agreements with Axecraft

6. Disclosure Of Personal Information

As a part of providing you with our products and services, and for the management and operations of these products and services, and to comply with legal and regulatory requirements, we may be required or need to disclose information about you and your account with us to the following third parties :

- companies and organisations that act as our agents, affiliates and/or professional advisers;
- companies and organisations that assist us in processing or otherwise fulfilling transactions that you have requested;
- law enforcement, regulatory and governmental agencies;
- your advisers (including but not limited to accountants, auditors, lawyers, financial advisers or other professional advisers) where authorised by you;
- any other person notified by you as authorised to give instructions or to use the accounts, facilities, products or services on your behalf.

The aforementioned third parties may in some instances be located outside of your country.



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. We will otherwise treat your personal information as private and confidential and will not disclose your information to anyone outside Axecraft except :

7. where you have given permission;
where we are required or permitted to do so by law;
where required or authorised by any order of court, tribunal or authority, whether governmental or quasi-governmental with jurisdiction over Axecraft;
where we may transfer rights and obligations pursuant to our agreement with you;
where we are required to meet our obligations to any relevant regulatory authority (whether in or outside your country).

Security Of Your Personal Information

Axecraft places great importance on ensuring the security of your personal information. We regularly review and implement up-to-date technical and organisational security measures when processing your personal information. Employees of Axecraft are trained to handle the personal information securely and with utmost respect, failing which they may be subject to disciplinary action.

However, please note that although we take reasonable steps to protect your information, no website, Internet transmission, computer system, or wireless connection is completely secure. We have therefore 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.

8. Global Company International Transfers

The personal information we collect from you may be transferred to, stored and processed outside of the jurisdiction in which you reside, and the laws of those countries may differ from the laws applicable in your own country. For example, information collected in the European Economic Area (EEA) may be transferred to, stored and processed at a destination(s) outside of the EEA. Any processing of such information will be undertaken by our staff, or the staff of our third-party service providers, whose roles will include verifying your identity, processing payment details, and providing customer support. By submitting your personal data, you agree to the transfer, storing or processing of it outside of your jurisdiction.



9. Data retention

We will only retain your personal data for the duration of your relationship with us, and afterwards for such periods as may be necessary to protect the interests of Axecraft and its customers, and as required by Axecraft's relevant policies, and as required by the law. 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 with 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.

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

Additional Matters Relating To Personal Information

Retention Of Personal Information

Axecraft will retain your personal information in compliance with this Privacy Policy and the terms and conditions of your agreements with Axecraft for the duration of your relationship with us, and afterwards for such period as may be necessary to protect the interests of Axecraft and its customers, and as required by Axecraft's relevant policies, and as required by the law.

Incomplete Personal Information

Where indicated (for example in application forms or account opening forms), it is obligatory to provide your personal information to us to enable us to process your application for our products or services. Should you decline to provide such obligatory personal information, we may not be able to process your application/request or provide you with our products or services.



10. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your data. Please click on the links below to find out more about these rights:

- *Request access to your personal data.*
- *Request correction of your personal data.*
- *Request erasure of your personal data.*
- *Object to processing of your personal data.*
- *Request restriction of processing your personal data.*
- *Request transfer of your personal data.*
- *Right to withdraw consent.*

If you wish to exercise any of the rights set out above, please contact our DPO.

No fee is 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 acknowledge all legitimate requests within 24hrs and resolve any queries within three (3) to five (5) business days. 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. **Your Right To Access And Update Your Personal Information**



11. You have a right to access your personal information. Please contact customer support if you wish to have access to your personal information. Axecraft will take steps to verify your identity before fulfilling your request.

If there are any changes to your personal data or if you believe that the personal data we have about you is inaccurate, incomplete, misleading or not up-to-date, please contact us so that we may take steps to update your personal data. Axecraft may use its discretion in allowing the corrections requested and/or may require further documentary evidence of the new information to avoid fraud and inaccuracy.

Acceptance Of Privacy Policy

By accessing and using any of our services, you signify acceptance to the terms of this Privacy Policy. Where we require your consent to process your personal information in a manner other than as contained in this Privacy Policy, we will ask for your consent to the collection, use, and disclosure of your personal information. Axecraft may provide additional "just-in-time" disclosures or additional information about the data collection, use and sharing practices of specific products and services. These notices may supplement or clarify Axecraft's privacy practices or may provide you with additional choices about how Axecraft processes your data. If you do not agree with or you are not comfortable with any aspect of this Privacy Policy, you should immediately discontinue access or use of our services and products.

12. Additional Matters Relating To Personal Information

Retention Of Personal Information

Axecraft will retain your personal information in compliance with this Privacy Policy and the terms and conditions of your agreements with Axecraft for the duration of your relationship with us, and afterwards for such period as may be necessary to protect the interests of Axecraft and its customers, and as required by Axecraft's relevant policies, and as required by the law.

Incomplete Personal Information

Where indicated (for example in application forms or account opening forms), it is obligatory to provide your personal information to us to enable us to process your application for our products or services. Should you decline to provide such obligatory personal information, we may not be able to process your application/ request or provide you with our products or services.

Revisions To This Privacy Policy



This Privacy Policy may be revised from time to time. If there are any material changes, Axecraft will notify you (e.g. by email communication or posting a prominent notice). This version was last updated on 1 January 2024.

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.

Contacting Axecraft In Relation To Personal Information

Should you have any query in relation to this Privacy Policy or how we handle your personal information, please email us at: legal@axecraft.co..

13. Glossary

LAWFUL BASIS

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights 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). You can obtain further information about how legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

Complying with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

YOUR LEGAL RIGHTS

You have the right to:

Request access to your personal data. 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. This enables you to ask us to delete or remove personal data where there is no good reason for us to continue 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) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in 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.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

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. 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.