

# NUBIO PAYMENTS INC.: PRIVACY POLICY

Last updated: July 1, 2024

## 1. Introduction

NUBIO PAYMENTS INC. is committed to protecting your privacy and safeguarding your personal data. This Privacy Policy (the “Policy”) outlines the general principles regarding how NUBIO PAYMENTS INC., its licensors, and affiliates (collectively, “NUBIO”, “we”, “our”, or “us”) collect and process information when you visit our website at <https://nubio.io/> (the “Website”), use any of our services (the “Services”), or interact with us through other means, such as social media. By engaging with us via the Website or our Services, you (“you”, “your”, “client”, “client representatives”, “data subject”) agree to this Policy. “Your Personal Data” refers to any information that can be used to identify, contact, or locate you directly or indirectly (“Personal Data”). We process Personal Data in accordance with this Policy and applicable laws, including the Personal Information Protection and Electronic Documents Act (PIPEDA), the Personal Information Protection Act (PIPA), and the General Data Protection Regulation (GDPR), where applicable (“Data Protection Law”).

## 2. Scope of the Policy

2.1. This Policy explains how we process Personal Data in relation to:

2.1.1. All activities involving you as the data subject, including the submission of personal data via forms on the Website, browsing our Website, providing information, taking steps before entering into an agreement with your organization, and subsequent processing for the performance of the agreement.

2.1.2. The use of cookies on our Website or live chat operations.

2.1.3. Our statutory obligations under Data Protection Law and other applicable laws and regulations.

## 3. Principles of Personal Data Processing

3.1. We adhere to the principles of personal data protection as specified in Data Protection Law. Personal data will be:

3.1.1. Processed fairly, lawfully, and transparently concerning the data subject.

3.1.2. Collected for specified, explicit, and legitimate purposes and not processed further in a way that is incompatible with those purposes.

3.1.3. Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

3.1.4. Accurate and kept up to date.

3.1.5. Retained no longer than necessary.

3.1.6. Processed in a manner that ensures appropriate security.

#### **4. Legal Basis for Processing Your Personal Data**

We process your Personal Data based on:

- Your consent.
- A contractual relationship between us.
- Legal obligations to which we are subject.
- Our legitimate interests.

We limit the processing of your Personal Data to the scope and purpose for which it was collected. If processing is based on your consent, you have the right to withdraw your consent at any time. However, this may limit the services we can provide if required by law.

#### **5. Personal Data Processing**

5.1. For Services, we may process the following categories of your Personal Data:

5.1.1. Consent to Personal Data processing: Personal Data may be processed with the consent of the data subject. Consent must be obtained by opting in with “I agree with the Privacy Policy” or through written or electronic means.

5.1.2. Personal Data processing for business relationships: Your Personal Data can be processed to establish, execute, and terminate business relationships. This includes processing during the initiation phase for preparing bids, purchase orders, and fulfilling other requests related to concluding an agreement. We process data such as Name and Surname, Phone, Email address, Identification Document (i.e., ID Card), IP address, personal description, and information on welfare and its sources for beneficiaries and/or shareholders.

5.1.3. Personal Data processing for marketing purposes: We may send you information, news, or events related to our services. Personal Data is processed for marketing or market and opinion research, consistent with the original purpose of collection. Consent is required via email or phone number for marketing purposes. If consent is not provided, the data will not be used for these purposes. Data processed includes Name and Surname, Email address, and Phone.

5.1.4. Personal Data processing under legal obligations: Processing is permitted if required by national legislation. The scope of processing must comply with relevant statutory provisions.

5.1.5. Personal Data processing for legitimate interests: Personal Data can be processed if necessary for the legitimate interest of NUBIO. Legitimate interests may be legal (e.g., collecting outstanding receivables) or commercial (e.g., improving services). Before processing, we assess if legitimate interests justify the processing.

5.1.6. Personal Data processing using Cookies: We use cookies to enhance your experience on our Website. Cookies generally do not include data that individually identifies you. We collect technical information (e.g., IP address, login details, browser type), and information about your visit (e.g., URLs, interaction data).

5.1.7. Automated decision-making and profiling: Automated processing (profiling) to evaluate personal aspects (e.g., behavior, performance) cannot be the sole basis for decisions with negative legal consequences. The data subject must be informed about automated decisions and have the possibility to respond.

5.1.8. Special category of Personal Data: We process sensitive personal data only if permitted by law. We do not seek to collect or process such data unless required for changes in processing purposes.

5.1.9. Restricted processing: We do not knowingly provide services to or collect data from individuals under 18 years old. If you are under 18, do not provide personal data on our Website. If you believe a person under 18 has provided us with personal data, contact us at [info@nubio.io](mailto:info@nubio.io) to delete the data.

## **6. Your Rights Regarding Personal Data Processing**

We are legally obligated to keep your Personal Data accurate and up to date. You have the following rights:

- a) Right to access: You can request access to your Personal Data, including information about processing purposes and categories.
- b) Right to rectification: You can request corrections to inaccurate or incomplete Personal Data.
- c) Right to object: You can object to certain processing of your Personal Data, such as for marketing purposes or based on legitimate interests.
- d) Right to erasure: You can request the deletion of your Personal Data under certain conditions, such as when it is no longer necessary for the purposes it was collected.
- e) Right to data portability: If processing is based on consent or a contractual relationship, you can request your Personal Data in a structured, machine-readable format and request its transfer to another controller if technically feasible.
- f) Right to withdraw consent: You can withdraw consent to processing at any time.
- g) Opt-out from marketing: You can opt-out of marketing communications at any time by contacting us.

For questions or concerns, contact our Data Protection Officer at [info@nubio.io](mailto:info@nubio.io) or our registered address: #202 - 346 LAWRENCE AVE, OFFICE K, KELOWNA BC V1Y 6L4, CANADA. If you cannot resolve your issue with us, you can lodge a complaint with the Office of the Privacy Commissioner of Canada: <https://www.priv.gc.ca/en/>.

## **7. Recipients of Personal Data**

To provide services, we may share your Personal Data with partners, third-party service providers, related entities, and regulatory bodies. They process your data based on data processing agreements and strict instructions. Categories of recipients include NUBIO Group companies, KYB service providers, credit institutions, payment processors, technical or information service providers, and e-wallet providers. We may also disclose your data to financial institutions, enforcement, or court authorities as required by law or to protect our rights.

## **8. Security Measures and Technical Solutions**

We implement administrative, technical, and organizational measures to protect Personal Data against loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. Access to Personal Data is restricted to authorized staff who need it for their duties. We regularly audit systems, train staff, and define responsibility areas for data processing.

## **9. Personal Data Storage and Retention**

We retain your Personal Data only as long as necessary for the purposes for which it was collected and processed.

## **10. Changes to the Policy**

We may update this Policy to reflect changes in data processing practices and protection standards. The latest version will be published on our Website with prior notification of changes. Continued use of our Services after amendments indicates acceptance of the updated Policy.

## **11. Contact Us**

If you have any questions about this Policy, contact us at:

NUBIO PAYMENTS INC.

Incorporation number: BC1373974

MSB registration number: M23813177

Main office or location of MSB: #202 - 346 LAWRENCE AVE, OFFICE K, KELOWNA BC  
V1Y 6L4, CANADA

Telephone number: +37125979581

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