

Privacy Policy

May 13th 2019

PLEASE, READ CAREFULLY
#PAYATTENTIONPLEASE

1. What is Rebellion Pay?

RBLDE UNCONVENTIONAL, S.L. is a Spanish start-up whose registered office is located in Madrid (Calle Serrano 57, 4th Floor) which aims to offer financial services in a comfortable and accessible way to a growing market that is not covered by the traditional financial sector. RBLDE UNCONVENTIONAL, S.L. owns the registered trademark Rebellion Pay. RBLDE UNCONVENTIONAL, S.L.'s Taxpayer Identification Number is B87883088.

2. What is Prepaid Financial Services (PFS)?

Prepaid Financial Services (PFS) is a rapidly growing technology company and an electronic money and payment institution with offices in the United Kingdom, Malta and Ireland. PFS is authorised and regulated by the Financial Conduct Authority in the United Kingdom as an electronic payment institution under the reference number 900036. We provide own-brand and white-brand financial electronic money solutions, such as electronic wallets (e-wallets), prepaid cards and current accounts. PFS offers customers complete integrated solutions by designing, developing, implementing and managing these programmes.

3. What, why?

It is important you know exactly what we do with the personal information you or other people provide us, why we collect it and what it means for you. This document sets out PFS's approach to data privacy to fulfil our obligations according to the European Union's General Data Protection Regulation (GDPR) of 25 May 2018. Moreover, we view it as an opportunity to reaffirm how important protecting your personal data is to us and the strict guidelines we apply for its use.

The personal data we would like to collect from you include:

- Name and surname
- Date of birth

- Email address
- Documents that prove your address
- Identity documents
- Address
- Telephone number
- Other personal information like telephone records, security questions or/and user's identity documents

The personal data we collect will be used for the following purposes:

- Offer you prepaid card services according to our contractual obligations
- Offer you e-wallet services
- Offer you IBAN account services
- Process your account information
- Fulfil our legal obligations to prevent fraud, money laundering, the financing of terrorism or the misuse of the services
- Verify your identity
- Contact you regarding our services
- Where required by the Law, investigate a crime

Our legal grounds for processing personal data are as follows:

- Having received your consent;
- Having entered into a contract to which you are a party;
- Legal obligations PFS is obliged to fulfil;
- National legislation;

The legitimate interests we or the third parties we collaborate with pursue are as follows: Preventing fraud, money laundering, the financing of terrorism or the misuse of the services.

4. Consent

By accepting this privacy notice disclosure, you grant us permission to process your personal data specifically for the purposes set out above. PFS requires consent to process personal data, but it should be granted explicitly. When we ask you for sensitive personal data, we will always inform you of the reason why and how the information will be used.

5. Consent for minors: from 14 to 18 years

If you grant consent on behalf of a minor under the age of thirteen, take into account that minors require specific protection concerning their personal data, since they might be less aware of the risks, consequences and safeguards it involves and of their rights in relation to the processing of personal data for the purpose of using these services. By accepting this privacy notice disclosure on behalf of a minor, you are granting permission to the use of their data for the purpose set out above.

6. Disclosure

PFS will only disclose your personal data, including internationally, once it has obtained your consent. Some of our service providers, like payment processors, risk management solutions and providers, have their registered office outside the EEA. Where we authorise the processing or transfer of your personal information outside the EEA, we request that your personal information is protected in accordance with data protection standards and we ensure suitable data protection safeguards are in place. The GDPR forbids transfers of personal data outside the European Economic Area to a third country lacking suitable data protection. Where transfers are made outside the EEA, third-party monitoring mechanisms are placed into effect:

- Data protection clauses in our contracts and agreements with third parties
- US-EU privacy shield
- Personal Information Protection and Electronic Documents Act (PIPEDA)

7. Who is your data's data controller?

The data controller of your personal data is the company called Prepaid Financial Services (PFS) with registered office at Langham House, Fifth Floor, 302-308 Regent Street, London, W1B 3AT. The company's registration number is 06337638.

8. Custody of the data

The personal data will be held by REBELLION and PFS during the time they maintain a contractual relationship with the User or for as long as the latter does not state his/her willingness to cancel the services. Once said time has elapsed, we will keep any data blocked which may turn out to be necessary to resolve issues

related to its processing during the time limits legally set forth, until at most six years in general, with regard to the obligations set forth in Article 21 of Act 10/2010 of 28 April on the Prevention of Money Laundering and the Financing of Terrorism.

9. User's rights concerning his/her data

The User is entitled to:

- Access his/her personal data
- Request the rectification of inaccurate data
- Request the data's erasure
- Request restrictions on the processing of his/her data
- Object to the processing of his/her data
- Request the data's portability
- Not be subject to automated decision-making and profiling
- Furthermore, the User may exercise his/her right to be forgotten

The User may exercise all these rights at the e-mail address hello@rebellionpay.com, indicating the reason for his/her request and attaching thereto a copy of his/her national ID card. The User may also send his/her request by ordinary post to the following address: RBLDE UNCONVENTIONAL, S.L., CALLE SERRANO 57, 4th FLOOR, 28006 MADRID

If the User considers that the processing of his/her data breaches the Regulation or if he/she has not been allowed to exercise his/her rights, the User shall be entitled to file a claim before the supervisory authority, particularly in the Member State where he/she has his/her place of residence, place of work or where the supposed breach has taken place, without detriment to any other administrative appeals or legal actions. The supervisory authority before which the claim is filed shall keep the claimant informed about the claim's substantiation and outcome.

10. Data security

The protection of Users' privacy and personal data is highly important for REBELLION and PFS. Thus, REBELLION and PFS do everything which is within their power to prevent your data from being used improperly by only allowing authorised personnel to access said data.

REBELLION and PFS maintain data protection security levels that are in accordance with the regulations that apply and have implemented all the technical measures within their reach to prevent the loss, misuse, alteration, unauthorised access to and theft of the data the User provides through the

Platform, without detriment to informing the User that security measures on the Internet are not invulnerable.

REBELLION and PFS undertake to keep personal data secret and confidential in accordance with the legislation which applies, as well as to subject such data to secure processing in international assignments or transfers of data, if any, which may come about.

A password must be chosen for any of the Platform's services that require registration as a User. The User is responsible for keeping said password confidential, along with all the activities which take place in a session initiated with the User's username and password.

The User undertakes to notify REBELLION as soon as possible of any unauthorised use of his/her username and/or password or of any other security breach. REBELLION or PFS shall not be liable for any damages or losses that may come about as a result of the User's failure to fulfil this obligation.

11. Changes

REBELLION reserves the right to review its Privacy Policy at any time it deems appropriate. We therefore ask you to check this Privacy Policy on a regular basis to read the most recent version thereof.

Nonetheless, notice of any change that may come about to this Privacy Policy shall be given to the User.

12. Links to websites

The REBELLION website may contain links to websites of companies and entities owned by third parties.

REBELLION and PFS may not be held liable for the way in which these companies deal with personal data protection and privacy. We therefore advise you to read the privacy policy disclosures on the use, processing and protection of personal data of these websites which are not owned by REBELLION.

The terms and conditions these websites offer might not be the same as the ones offered by REBELLION.

13. Queries

If you have any queries about this Privacy Policy or the processing of your data, please get in touch with REBELLION by sending an e-mail to the e-mail address hello@rebellionpay.com.

14. Acceptance and Consent

The User hereby states he/she has been informed about the personal data protection terms and conditions and accepts and consents to the processing of said personal data by REBELLION in the way and for the purposes set out in this Privacy Policy.