Ferratum's Privacy Policy

Latest updated on August 01, 2024

These principles of Processing the www.global.ferratum.com website (hereinafter website) visitors Personal Data (hereinafter also principles) describe how we, Ferratum (hereinafter also we, us or our) process Personal Data of our website visitors and any other Data Subjects (hereinafter also you). These principles apply if you visit our website, or in case you have expressed your wish to receive any information about our products or services.

1. Definitions

- 1.1. **Data Protection Regulations** Any applicable laws and regulations regulating the processing of Personal Data, including but not limited to the GDPR;
- 1.2. **Data Subject** an identifiable natural person who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 1.3. **Ferratum** Multitude P.L.C., Malta Registry of Companies code C 109441 with address ST Business Centre 120, The Strand, Gzira, GZR 1027, Maltamailto:service.de@ferratumbank.com; e-mail info@ferratum.com;
- 1.4. **GDPR** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
- 1.5. **Personal Data** Any information relating to Data Subject. Data which is protected by banking secrecy may also include Personal Data;
- 1.6. **Processing** Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether by automated means, such as collection, recording, storing, alteration, granting access to, making enquiries, transfer, viewing, etc.

2. Data Controller

- 2.1. Ferratum is responsible for the Processing of your Personal Data and for those reasons we are the data controller under the GDPR.
- 2.2. As Ferratum is a company established under the laws of Republic of Malta, then the Processing of your Personal Data shall be governed by the laws of Malta.

3. Collecting your Personal Data

- 3.1. Ferratum collects your following Personal Data in the following ways:
- 3.1.1. contact and communication data through communications made to us;
- 3.1.2. technical logs by automatic means when you use our website. Such Processing is further explained in our Cookies in Section 10.

4. Personal Data Processed

4.1. Ferratum Processes Personal Data collected for the following purposes:

- 4.1.1. performance of our obligations arising from law;
- 4.1.2. safeguarding our rights (establishing, exercising, and defending legal claims). The legal basis for such Processing is Ferratum's legitimate interest;
- 4.1.3. assessing and developing further the quality of our services and products, e.g., customer support service and quality assurance service. The legal basis for such processing is the legitimate interest of Ferratum;
- 4.1.4. assessing the quality of our (potential) service providers services which enables us to evaluate and develop further the quality of the services and products we offer. The legal basis for such processing is the legitimate interest of Ferratum;
- 4.1.5. internal record and statistics keeping;
- 4.1.6. security of the website to guarantee a safe consultation and secure interaction with our systems;
- 4.1.7. to ensure the best user experience;
- 4.1.8. the purposes you would have requested when providing your Personal Data to us.

5. Disclosing the Personal Data

5.1. We do not share your personal data with third parties and do not transfer your Personal Data outside of the European Economic Area.

6. Cookies

6.1. Our website does not use any cookies. This means we do not collect or store any personal information or browsing data from your visit.

7. Protection of Personal Data

7.1. Ferratum endeavours to maintain physical, technical, and procedural safeguards appropriate to the sensitivity of the Personal Data in question. These safeguards are designed to protect your Personal Data from loss and unauthorized access, copying, use, modification, or disclosure. Despite these safeguards, please note that no method of transmission over the internet or data storage is fully secure. Should we be required by law to inform you of a breach to your Personal Data we may notify you electronically, in writing, or by phone.

8. Data retention

8.1. Ferratum retains your Personal Data in accordance with industry guidelines for as long as necessary for the purposes for which they were collected, or for as long as necessary to safeguard our rights, or for as long as required by applicable legal acts. Kindly note that if the same Personal Data is Processed for several purposes, we will retain the Personal Data for the longest retention period applicable.

9. Your rights

- 9.1. To the extent required by applicable Data Protection Regulations, you have all the rights of a Data Subject as regards your Personal Data. This includes the right to:
- 9.1.1. request access to your Personal Data;
- 9.1.2. obtain a copy of your Personal Data;
- 9.1.3. rectify inaccurate or incomplete Personal Data relating to you;
- 9.1.4. erase your Personal Data;
- 9.1.5. restrict the Processing of your Personal Data;

- 9.1.6. be informed of the source from which your Personal Data originates where the Personal Data we hold about you was not provided to us directly by you;
- 9.1.7. should you believe that your rights have been violated, you have the right to lodge a complaint with:
 - Ferratum data protection officer at email <u>dpo@multitude.com</u>; or
 - The Office of the Information and Data Protection Commissioner, Address: Floor 2, Airways House, Triq Il Kbira, Tas-Sliema SLM 1549, Phone: 2328 7100, Email idpc.info@idpc.org.mt, Website https://idpc.org.mt/; or
 - Data Protection Supervisory Authority of your country.
- 9.2. When requesting access to, or rectification or deletion of your Personal Data, please note that we shall request specific information from you to enable us to confirm your identity and right to access, rectify or delete, as well as to search for and provide you with the Personal Data that we hold about you.
- 9.3. Kindly note that your right to access, rectify, or delete your Personal Data we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse your request. In addition, the Personal Data may have already been destroyed, erased, or made anonymous in accordance with our record retention obligations and practices.
- 9.4. If we cannot provide you with access to, or rectification or deletion of your Personal Data, we will inform you of the reasons why, subject to any legal or regulatory restrictions. We can assure you we will not discriminate you for exercising any of your rights described in these Principles.

10. Amending these principles

10.1. Should our Personal Data Processing practices change or there shall be a need to amend these principles under the applicable law, case-law or guidelines issued by competent authorities, we are entitled to unilaterally amend these principles at any time. Our most recent principles will always be published on our website, and we urge you to check this at least once a month.