

Fusepay Privacy Policy v1.1

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Effective Date: 01 August 2025

Company Registration Number: 8438081

PSP License Number: FP 04

Registered Office Address: Door 203, Michel Building, Quincey Street, Victoria, Mahe, Seychelles

1. Introduction

Fusepay Pty Ltd ("Fusepay", "we", "our", or "us") is committed to protecting the privacy, confidentiality, and security of your personal data. This Privacy Policy explains how we collect, use, disclose, store, and protect your information when you use our mobile application or website (together, the "Platform").

This Policy applies to all business customers and authorized users of our services. We process your data in accordance with the *Data Protection Act, 2022* of the Republic of Seychelles and other applicable legal and regulatory obligations.

2. What Data We Collect

We may collect and process the following types of personal and business-related data:

- **Identification information:** Name, date of birth, passport or national ID number
- **Contact information:** Phone number, email address, residential and business address
- **Business information:** Company registration details, proof of incorporation, proof of address
- **Financial information:** Bank account details, transaction history, payment references
- **Device and usage data:** IP address, device type, browser information, access logs, interaction patterns
- **Authentication and access data:** PIN, biometric authentication (used only on your device), OTPs
- **Geolocation data:** When enabled via device settings
- **Communications data:** Support messages, customer feedback, or correspondence
- **Third-party verification data:** Information received from KYC/KYB/AML providers
- **Cookies and analytics data:** If applicable, collected through your use of our website or app

We do not knowingly collect personal data from individuals under the age of 18.

3. How We Use Your Data

We use your data for the following purposes, in accordance with legal bases under applicable law:

- **To perform our contract with you,** such as account registration and transactions
- **To comply with legal obligations,** including regulatory and AML/CFT requirements
- **To issue, hold, and manage e-money and wallet balances**
- **To detect and prevent fraud, financial crime, or suspicious activity**
- **To provide, operate, and maintain our platform and services**
- **To communicate with you** about services, compliance, or support
- **To enhance security, performance, and customer experience**
- **To maintain internal records and audit logs**
- **Any other purpose disclosed to you at the time of collection or with your consent**

Legal bases include contract performance, legal compliance, legitimate interest, and your consent (where applicable).

4. Who We Share Your Data With

We do **not** sell or rent your data. We may share it only as required or permitted, with appropriate safeguards in place, including:

- **Regulatory authorities** such as the Central Bank of Seychelles, Financial Intelligence Unit (FIU), or tax bodies
- **Law enforcement agencies,** if legally required
- **Third-party service providers,** including:

- Identity verification and compliance vendors
 - Cloud and infrastructure providers
 - Payment processors and banking partners
 - Support, messaging, or analytics providers
- (All vendors are contractually obligated to protect your data.)

- **Auditors, legal advisors, or compliance professionals**
- **Successors or acquirers**, in the event of a merger, acquisition, or reorganization
- **Other third parties**, only with your explicit, informed consent

If any data is transferred outside Seychelles, we ensure adequate protection using contractual and legal safeguards.

5. Data Security and Retention

We take data security seriously and implement:

- End-to-end encryption of data in transit and at rest
- Secure cloud infrastructure with physical and logical access controls
- Role-based access with audit trails
- Multi-factor authentication for internal tools
- Regular cybersecurity reviews and testing

In the event of a data breach, you and the relevant authority will be notified in accordance with Seychelles law.

We retain personal and transactional data for the period required by law and regulation, including:

Retention Period: 7 years from the date of your last transaction

After the retention period, data will be securely deleted or anonymized.

6. Your Rights

You have the right to:

- **Access** the personal data we hold about you
- **Correct** inaccurate or outdated information
- **Request deletion**, where lawful and applicable
- **Restrict or object** to specific types of processing
- **Withdraw consent**, where processing is based on consent
- **Complain** to the Data Protection Commissioner of Seychelles

To exercise any of these rights, please contact us using the details below.

7. Contact Us

If you have questions, concerns, or wish to exercise your data rights:

Data Protection Contact

Compliance Officer

Fusepay Pty Ltd

Email: help@fusepay.app

8. Changes to This Policy

We may revise this Privacy Policy to reflect regulatory, legal, or operational changes. Material updates will be communicated to you via:

- Email
- In-app notification
- Banner announcement on our website or platform

The revised version will take effect on the date indicated above.
