



Global Privacy Policy



The Plata Capital Limited, our subsidiaries and affiliates (“t/a Sokin” or “we” or “us”) care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data protection laws to better serve you. For a list of local Sokin entities, please see here **“Plata Capital Ltd.”**

Scope of this privacy policy

This Privacy Policy describes how Sokin collects, uses, stores, protects, discloses and shares your personal information or data when you use our Services online through our website, or receive transactions and through our mobile app, as well as your choices about the way your information is collected and used.

Personal information means all information or data relating to an identified or identifiable individual.

Personal information Sokin collects

When you use our services, contact us, access our websites or mobile application or join one of our programs (collectively, the **“Services”**), we collect personal information about you and may use it along with other information collected or generated during our relationship with you. We collect different types of personal information relating to you, which may include:

- Contact information, for example your name, postal address, e-mail address, phone number, and date of birth, gender, citizenship, bank details and country of residence
- Transaction information, including money transfers;
- Business related information that helps us provide our Services to you, such as subscriptions in our services programs, how you use of our Services, bank and credit information, and permissions to contact or marketing choices;
- Technical information, including your IP address or device ID, Push ID, information about your device (such as device name, type, model, biometric data (mobile biometric data is not accessible to APP. We just verify biometric identity via mobile built-in feature), operating system software, the date and time you access our websites and the address of the site from which you linked to our website when you visit us.
- Compliance information, including fraud prevention, and sanction checks.
- To receive a money transfer or use other payment services, you must provide certain information required by Sokin to execute the transfer and to enable us to comply with our legal obligations associated with transferring money. Failure to provide some of your personal information may affect our ability to provide our Services to you. This may include information about the form of identification used to send or receive a transaction (where required by law) including the identification or a copy of the identification document, transaction activity, bank account and payment information.



How Sokin collects personal information

Sokin collects your personal information in several ways:

- Through transaction forms and your interactions with Sokin affiliates and subsidiaries;
- Information you provide to us to use our Services, you must provide certain Personal Data to us, including information required to establish an account profile, identity verification information, financial information, and information regarding beneficiaries of payments. This information is necessary for us to perform the contracted services and also to allow us to comply with our legal obligations
- Through online forms, registrations for subscriptions programs, and other online Services we offer (some of which may be managed by third parties on behalf of Sokin);
- While providing customer support or consultation, including using email, postal mail, call centres or live chat;
- Through the process of maintaining and upgrading our Services;
- Through automated means such as communications protocols, e-mail communications and cookies or similar internet technologies.
- Through our mobile applications (some of which may be managed by third parties on behalf of Sokin);
- Through your use of social media or other public data sources; and
- Through your interest in Sokin advertisements placed on third party sites.

In addition to the personal information we collect from you we may also collect your personal information from the person sending money, as well as our vendors and business partners.

How Sokin secures your personal information

We endeavour to use organizational, technical and administrative safeguards that comply with applicable government laws and regulations to secure your personal information. We also endeavour to restrict information access to our employees, third parties and representatives that need to know it.

Despite our efforts, and as you probably know, third parties may unlawfully intercept or access transmissions sent to us or may wrongly instruct you to disclose personal information to them while posing as Sokin.

Please contact us immediately in accordance with the **"Contact us"** section, if you have reason to believe your personal information held by Sokin may be at risk.



Internet technologies

We use internet technologies like cookies on our websites, in mobile applications or when you visit a third-party website for which Sokin provides online Services for a variety of purposes, including, but not limited to those identified in the section titled **"how sokin uses the personal information it collects"**. Sokin has implemented the capability for the user to manage cookies on our websites. We will only read or write cookies based on your preference level.

How Sokin Uses The Personal Information It Collects

Sokin utilizes the personal information it collects for the following commercial purposes:

- **Performing the Services:** To assist us in providing Services to you and help you to receive a personalized experience and assist you in receive transactions and access account information.;
- **Authentication:** To recognize you and allow you to remain signed-in during your visit without having to re-enter your password;
- **Analytics:** To perform analytics on understanding our customers, improving their experience;
- **Web Traffic Analysis:** To determine whether you came to Sokin from a banner ad or an Affiliate;
- **Advertising:** To deliver information specific to your interests on non-Sokin websites and applications;
- **Analysis of Promotions:** To better understand the effectiveness of our promotional campaigns and whether you acted on our promotional messages;
- **Fraud Prevention:** To promote safety, reduce financial risk and combat fraud across our Services.

Legal bases upon which we use your personal information

Sokin may use your personal information as explained elsewhere in this Policy for each of the following legal bases:

- We use your personal information to provide our services to you: This includes using personal information necessary for conducting money transfers, payment services, prepaid/debit cards, or subscriptions programs. We may use this information in the performance of a contract with you or for taking steps to enter into a contract for any of the above or for any other Sokin products or services.

We use your personal information for legitimate business purposes: This includes using personal information to analyze and improve our products, locations, services, operations, the running of this site and your customer experience, and for measuring marketing return on investment and brand satisfaction. This may include using your information to conduct market research surveys. We may also



use your personal information to provide customer services and to help protect the security and integrity of our technology, systems, and services.

- We use your personal information for legal and compliance purposes: This includes using personal information needed to comply with legal and regulatory duties related to anti-money laundering and counter-terrorist financing; detection, prevention and prosecution of fraud and theft as well as preventing illegitimate or prohibited use of our services or other illegal or wrongful activity.
- This may also include establishing, exercising, or defending legal rights and claims of Sokin and others, and monitoring and reporting compliance issues. This may further include using your personal information to validate and authenticate your identity, and utilizing third parties to help us do so.
- We may process your personal information based on your consent as outlined in this Policy: This includes consent for receiving marketing communications, or where otherwise required by applicable law. If we request your consent, we will inform you of the intended purposes for which your information will be processed.
- We will inform you when your information is required to provide the services you request, or is required by law. In certain cases, such as performing money transfer services, we may be unable to provide you with our Services unless you provide certain personal information.

How Sokin markets to its customers

Sokin will also, subject to your preferences, notify you of offers, promotions and updates regarding our products and Services. These may include offers by email, social media and other communication or digital channels.

You can opt out of receiving marketing communications at any time. If you no longer want to receive marketing-related communications from us on a going-forward basis, you may opt-out by following the instructions in the relevant electronic communication i.e. unsubscribe or by contacting us as described in the **"Contact us"** section.

Please note that if you opt-out of receiving marketing-related communications from us, we may still send you important service, administrative or transaction-related communications.

Information from children

Sokin does not direct our Services or products at children under the age of 18. Sokin does not knowingly collect or maintain information from our website or mobile apps from persons under the age of 18.

Who sokin shares your data with?

For any of the purposes listed in this Policy, Sokin may disclose applicable personal information including, but not limited to, your name, contact information, customer ID number, address, transaction patterns and bank account information to the following types of organizations or parties:



- Sokin group companies and affiliates;
- Required local remittance licensing entities relevant to a transaction;
- Our business partners who facilitate the money transfer transaction or specific service you have requested;
- Vendors, payments processors, banking partners and data processors contracted to provide business and customer services;
- Customer services, based on your consent where applicable, including marketing, advertising and customer satisfaction and market research on our behalf;
- Vendors and data processors contracted to help us validate the accuracy of the information provided by you, and to authenticate your identity and manage risks related to security, fraud and identity.

We may transmit personal information we possess in connection with a sale or transfer of all or part of our business. We may also disclose your personal information globally, as required or permitted by applicable laws and regulations, to regulatory and financial authorities, credit reporting agencies, law enforcement bodies, courts, governments or government agencies, to meet compliance and legal obligations or to assert or defend the rights and interests of Sokin or others.

International data transfers

We transfer your information to parties in countries outside the country it was collected, as permitted or required by applicable law, regulatory authorities, law enforcement and government agencies.

Additionally, when you send or receive money to or from another country, we will also be required to share some of your personal information with that country as required or permitted by law. We transfer certain personal information about you to our data centres located in the UK\EU or within a region as required by local law and process it to fulfil our legal and compliance obligations which apply to our Services.

By using Sokin's Services, you acknowledge that such transfers of information outside of your country of residence may occur.

Retention of personal information

Your personal information will be retained in accordance with statutory periods contained in regulations applicable to financial transactions including those in anti-money laundering, anti-terrorist financing and other laws applicable to us which would be 7 years. Otherwise, we will retain your information only if necessary for the specific purposes it was collected, or to resolve any query you may raise.

We will typically keep your information for no longer than the purpose(s) for which it was obtained, unless we have a legal obligation to keep it for a longer period or retention is advisable for Sokin's legal position (for example, regarding applicable statutes of limitations, litigation or regulatory investigations).



Accessing, deleting and correcting your personal information and changing your choices

You have the right to know if we are processing your personal information and to ask us for a copy of your information free of charge.

You have the right to request a structured and machine-readable copy of certain information you have provided to us. We may charge you a reasonable fee for providing the information, or not act upon your request, if the request is manifestly unfounded or excessive.

You have the right to stop us from sending you marketing communications.

You have the right to ask us to correct information about you that is incomplete, inaccurate or out-of-date.

You have the right to ask us to delete certain information about you, to restrict certain uses of information relating to you, and to object to certain uses of it. To the extent we are processing personal information based on your consent, you may withdraw your consent as permitted by applicable law.

You also have the right to lodge a complaint with a relevant data protection regulator or supervisory authority about our processing of personal information. When we receive a request, we may ask for additional information from you to verify your identity. In some situations, we may refuse to act or may impose limitations on your rights, as permitted by applicable law.

To exercise these rights, please contact us through the section titled **"Contacting Us"**. We will endeavour to respond to your request within 30 days after confirmation of your identity, but response time may vary depending on the laws and regulations applicable to your request, and we may be entitled to extend this period in certain circumstances. We will comply with your request to the extent required by applicable law.

Contacting us

If you have a question or complaint about how we handle your personal information, we ask that you put your inquiry in writing. We will investigate your inquiry and generally respond to you in writing within 30 days of receipt. You can also contact us, including our Data Protection Officer, at privacy@sokin.com

Changes

Sokin reserves the right to modify this Global Privacy Policy. Updated Privacy Policies will be posted on the Sokin App and Sokin Website when amendments occur. We urge you to review this Privacy Policy when you visit to obtain the most current Policy.

This Global Privacy Policy has been updated on: 29 July 2021.



www.sokin.com

If you have any questions feel free to contact us at help@sokin.com

Sokin is a trading name of Plata Capital Ltd. Registered Office: 1st Floor 90 Chancery Lane, London, United Kingdom, WC2A 1EU Registered Number 10958599. Registered in England and Wales. www.sokin.com. Mastercard is a registered trademark and the circles design is a trademark of Mastercard International Incorporated. Sokin cards provided to EEA residents are issued by Transact Payments Malta Limited and Sokin cards provided to UK residents are issued by Transact Payments Limited pursuant to licences by Mastercard International. Transact Payments Malta Limited is duly authorised and regulated by the Malta Financial Services Authority as a Financial Institution under the Financial Institution Act 1994. Registration number C 91879. Transact Payments Limited is authorised and regulated by the Gibraltar Financial Services Commission.

