

Privacy Policy



January 2023

1. **WHO ARE WE?** We are RBLDE UNCONVENTIONAL S.L. ("Rebellion") and PFS Card Services Ireland Limited ("PCSIL"), and we process your personal data for certain purposes as joint controllers. This means that we are jointly responsible for how we use and protect your data for those purposes.

2. **WHAT DO WE USE YOUR DATA FOR?** We will use your data (obtained by you or your legal representative), among other purposes, to manage your registration as a user, maintain and execute the contracted service, verify your identity, fight against fraud, answer your queries as well as, if you wish, to send you our personalized communications.

3. **WHY DO WE USE THEM?** We are legally entitled to process your data for different reasons. The main reason is that we need to process your information to perform the contract you entered into with us when you registered. We also process your data for other reasons, for example, to comply with our legal obligations.

4. **WHO DO WE SHARE YOUR DATA WITH?** We will share your information with service providers who assist or support us as partners with whom we have entered into an agreement.

5. **YOUR RIGHTS.** You have the right to access, rectify or delete your personal data. In some cases, you also have other rights, for example, to object to our use or transfer of your data, to request the limitation of their processing or not to be subject to automated decisions, as explained below.

We invite you to read carefully our complete Privacy Policy below to understand in detail the use we will make of your personal data and the rights you have in relation to them.

Before you begin...

In this Privacy Policy you will find all the relevant information that applies to our use of the personal data we collect and process for various purposes.

We are transparent about what we do with your personal data, so that you understand the implications of the processing we carry out or the rights you have in relation to your data:

- We make permanently available to you all the information in this Privacy

Policy that you can consult whenever you deem appropriate from www.rebellionpay.com/legal.

- The main regulations governing the processing that we will conduct with your personal data are:
 - 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.
 - The Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights.

1. Who is the Controller of your data?

Data Controller

The Controller of the processing of your personal data is RBLDE UNCONVENTIONAL S.L. ("Rebellion"), a Spanish Startup.

TAX ID: B87883088

Postal Address: Calle Serrano 88, planta 2, 28006, Madrid.

Email: dataprotection@rebellionpay.com.

Joint Data Controller

In addition, for certain processing indicated in Section 2 of this Policy, Rebellion will process your data together with PFS Card Services Ireland Limited ("PCSIL"), authorized and regulated by the Central Bank of Ireland, as an electronic money institution, under reference number C175999, acting as joint controllers of the processing, jointly deciding the purposes and means of the processing.

Number: 590062

Registered office: at the Head Office, Scurlockstown Business Campus, Trim, Co. Meath, Ireland.

Email: proteccion.datos@emlpayments.com

2. For what purpose and on what basis do we process your data?

| Purpose | Basis of Legitimacy |
|---|---|
| 1. To manage your registration as a user in the App | The processing of your data is necessary for the enforcement of the terms and conditions governing the use of the App. In other words, in order for you to register as a user on the App, we need to process your personal data, otherwise we would not be able to manage your registration. |

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| | <p>The legal basis is the application at your request of pre-contractual measures (art. 6.1.b) GDPR).</p> <p>When at the registration stage we ask you to provide certain data, we do so in compliance with a legal obligation that applies to us, in particular, the identification obligations (KYC) arising from Law 10 / 2010 of April 28, 2010, on the Prevention of Money Laundering and Terrorist Financing and its implementing regulations.</p> <p>The legal basis is compliance with a legal obligation applicable to the data controller (art. 6.1.c) GDPR). Legitimate interest of the Data Controller (art. 6.1.e) GDPR).</p> <p>When at the registration stage we ask you to provide us with sensitive data such as your image and sound to verify your identity, we consider that we have a legitimate interest to carry out the necessary checks , to detect and prevent that illicit activities of fraud, money laundering, terrorist financing or misuse of the services are actually carried out. In these cases Rebellion may treat or transfer to third party providers your personal data without the need for other bases of legitimacy, ensuring in any case the prevalence of the rights and freedoms of the data subject.</p> <p>The legal basis is the legitimate interest of the Data Controller (art. 6.1.e) GDPR).</p> <p>When you provide us with biometric data in order to ensure the confidentiality, integrity, availability and authenticity of your account information in the access phase of the app on any mobile device we will ask for your consent to do so.</p> <p>The legal basis is the consent given by the data subject to the processing of his personal data for one or more specific purposes (art. 6.1.a) GDPR).</p> |
| 2. Development, maintenance and execution of the prepaid card, e-wallet and IBAN account service contract you sign. | <p>The processing of your data is necessary for the maintenance and execution of the service contract that binds us to you. This means that in order to offer you these services we need to process some of your personal data and for this we need you to provide them to us. In the event that you do not provide them, or they are inaccurate or incomplete, we will not be able to provide the contracted services properly. Customers are responsible for the veracity of the data provided, as well as for communicating to Rebellion any changes to them.</p> <p>The legal basis is the execution of a contract to which the data subject is a party or for the implementation at the request of the data subject of pre-contractual measures (art. 6.1.b) GDPR).</p> |
| 3. To answer your enquiries for information about Rebellion. | <p>We consider that we have a legitimate interest in responding to requests or queries that you submit to us through the various existing means of contact. We understand that</p> |

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| | <p>the processing of this data is also beneficial to you insofar as it allows us to serve you properly and resolve the queries raised..</p> <p>The legal basis is the legitimate interest of the Data Controller (art. 6.1.e) GDPR).</p> |
| <p>4. To prevent fraud, money laundering, terrorist financing or misuse of services.</p> | <p>We consider that we have a legitimate interest to conduct the necessary checks , such as the use of geolocation data from your device, to detect and prevent unlawful activities of fraud, money laundering, terrorist financing or misuse of the services from actually being carried out. In these cases Rebellion may process or transfer to third party providers your personal data without the need for other bases of legitimacy, ensuring in any case the prevalence of the rights and freedoms of the data subject.</p> <p>The legal basis is the legitimate interest of the Data Controller (art. 6.1.e) GDPR).</p> <p>When we process the data you provide to clarify illegal activities of fraud, money laundering, terrorist financing or misuse of services that you have suffered without being a user, these data may be transferred to public authorities to fulfill our legal obligation to cooperate in the investigation and prosecution of criminal offences.</p> <p>The basis of legitimacy is compliance with a legal obligation applicable to the controller (art. 6.1.c) RGPD), in particular, with the duty to cooperate established in art. 7 of Organic Law 7/2021 of 26 May on the protection of personal data processed for the purposes of prevention, detection, investigation and prosecution of criminal offences and the execution of criminal penalties.</p> |
| <p>5. To provide you with commercial information about our services and special offers.</p> | <p>The legitimate basis for processing your data for marketing purposes is the consent you give us, for example, when you agree to receive marketing information when you register for the App.</p> <p>The legal basis is the consent given by the data subject to the processing of his or her personal data for one or more specific purposes (art. 6.1.a) GDPR).</p> |
| <p>6. To manage the CVs of job applicants.</p> | <p>When you sign up for any of our open selection processes, or send us your CV, your data will be processed in order to apply at your request.</p> <p>The legal basis is the application at his request of pre-contractual measures (art. 6.1.b) GDPR).</p> <p>In the event that you are finally selected, your data will be processed to manage the employment relationship or to comply with the requirements imposed by law, such as Social Security contributions, tax obligations, registration of working hours, etc.) or by a collective agreement (art. 6.1.c) GDPR.</p> |
| <p>7. To manage your participation in the satisfaction surveys sent.</p> | <p>We consider that we have a legitimate interest in sending quality surveys through the various means of contact available. We understand that the processing of this data is also beneficial for</p> |

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| | you as it allows us to improve our services and offer you a better user experience. The legal basis is the legitimate interest of the Data Controller (art. 6.1.e) GDPR). |
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Depending on the purpose at any given time we will need to process some data or others, which in general will be, as the case may be, the following:

- **Identifying and contact data:** name and surname, postal, telephone and electronic contact information, residence address, nationality, date of birth, age, National ID, passport or Foreign National Identity Number, as well as data related to your voice and image.
- **Biometric data:** data related to your facial pattern.
- **Geographic data:** the geolocation data of your mobile device provided by the installation and/or use of our mobile application.
- **Legal capacity data:** data on the legal capacity of a natural person.
- **Basic financial data:** current and historical balances of products and services and payment history of contracted products and services.
- **Third-party data observed in the statements and receipts of demand and payment accounts:** information on the entries and movements that third party issuers make in their accounts, including the type of transaction, the issuer, the amount and the concept appearing in the receipts and statements of transactions performed.
- **DCommunications data:** data resulting from telephone calls or contacts you make with Rebellion through any oral or written communication channel, such as email, instant messaging, social networks, or conversational interfaces made available to you at any time.
- **Own browsing data:** data obtained from your browsing on our websites or mobile applications and your browsing on them: browsing history (pages visited and clicks on content), device ID, advertising ID, IP address, whether you have accepted the use of cookies and similar technologies on your browsing devices.
- **Data related to international sanctions:** data of persons or entities that are included in laws, regulations, guidelines, resolutions, programs or restrictive measures regarding international economic-financial sanctions imposed by the United Nations, the European Union, the Kingdom of Spain, as well as the Office of Financial Sanctions Implementation (OFSI) or Her Majesty's Treasury (HTM) of the United Kingdom and/or the U. S. Department of the Treasury's Office of Foreign Assets Control (OFAC).

3. How long do we keep your data?

Personal data obtained through the contact form or request for information will only be kept for the time necessary to attend to and follow up on your request.

Personal data of our clients will be kept for the duration of the contract and subsequently until the prescription of possible responsibilities. Specifically, Rebellion will keep the data of the interested party for a period of 10 years from the termination of the contractual relationship or from the execution of the operation, according to article 25.1 of Law 10/2010, of April 28, on the prevention of money laundering, of capital and terrorist financing for use in any investigation or analysis, in matters of possible cases of money laundering or terrorist financing, by the Executive Service of the Commission or any other legally competent authority.

Personal data relating to job candidates will be kept for a period of one year from the date of completion of the selection process. However, in the event that the candidate is selected, their curricular data will be kept for the purpose of managing the employment relationship.

Personal data processed for the purpose of sending communications will be processed until the user objects or withdraws consent to continue receiving them.

4. Consent for minors: from 14 to 18 years of age

Processing based on consent given by a person over 14 years of age and under 18 years of age shall only be lawful if the consent of the holder of parental authority or guardianship is given, to the extent determined by the holders of parental authority or guardianship. Rebellion shall make reasonable efforts to verify in such cases that the consent was given or authorized by the holder of parental or guardianship over the child, taking into account available technology.

5. Recipients to whom your data will be disclosed

In order to fulfil the purposes set out in this Privacy Policy, it is necessary for us to give access to your personal data to certain entities that support us in the services we provide.

Joint Data Controller

Your data will be transferred to our payment and e-money service provider PFS Card Services Ireland Limited ("PCSIL") who will be responsible for your data as Joint Controller for the purposes of executing the contract for the provision of prepaid card, e-wallet and IBAN account services, verifying your identity and preventing fraud.

Data recipients

Your personal data may also be accessed by the service providers that Rebellion contracts or may contract for the purpose of developing, maintaining and executing the contracted service contract and who have the status of recipients of the data, namely:

- financial institutions
- fraud detection and prevention entities
- technology and analytics service providers
- providers of services related to customer care
- marketing and advertising service providers and partners

In any case, Rebellion enters into contracts with these service providers that guarantee the processing of the data by them and in full compliance with the applicable data protection regulations.

For efficiency of the service, some of the aforementioned service providers are located in territories outside the European Economic Area, which does not provide a level of data protection comparable to that of the European Union. In such cases, we inform you that we transfer your data with adequate guarantees and always maintaining the security of your data, as we use the most appropriate tools for the international transfer of data, such as the Standard Contractual Clauses or any other relevant complementary measures. You can consult the content of the Standard Contractual Clauses at the following link:

https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_es

Third Parties

Provided that you have given your consent to this effect, we may transfer your data to third parties, so that they can contact you to inform you about products or services that these companies market, both in a generic and personalised way, adapting the offers to your needs, tastes and preferences.

Finally, we inform you that your personal data may also be transferred to Public Administrations, Authorities and Public Bodies, including Courts and Tribunals, suppliers and third party collaborators, when so required by the applicable regulations or when necessary for the prevention, investigation and discovery of fraud, the fight against money laundering and the financing of terrorism and other serious forms of organised crime, as well as for the proper management of the products and services contracted.

We also inform you that our suppliers may be obliged by the legislation of the State where they are located, or by agreements entered into by the latter, to provide information on transactions to the authorities or official bodies of other countries, both inside and outside the European Union, in the framework of the fight against the financing of terrorism and serious forms of organised crime and the prevention of money laundering.

6. What are your rights regarding your data?

We are committed to respecting your privacy and guaranteeing the exercise of your rights. To do so, you can exercise them free of charge by sending us an email to the following address: dataprotection@rebellionpay.com or send your request by ordinary mail to the following address: Rblde Unconventional S.L., Calle Serrano 88, 2ª planta, 28006, Madrid indicating the reason and providing a copy of your ID card on both sides.

We also provide you with a specific channel in our App so that you can write to us in the section Help and legal > Speak with Support > Data protection.

We inform you that you may at any time exercise any of the following rights with respect to your personal data:

| RIGHT | CONTENT |
|---------------------------|--|
| Access | You may receive confirmation as to whether or not your personal data is being processed and consult those data that are being processed. |
| Rectification | You may modify your personal data if it is inaccurate or incomplete. |
| Erasure | You may request the erasure of your personal data unless it is necessary for compliance with a legal obligation that requires the data to be processed. |
| Restriction of processing | <p>You may request the restriction of the processing of your data when one of the following conditions is met:</p> <ul style="list-style-type: none"> ❖ Pending a challenge to the accuracy of your data. ❖ When the processing is unlawful, but you object to the erasure of your data. ❖ When Rebellion does not need to process your data but you need it for the exercise or defence of claims. ❖ When you have objected to the processing of your data for the performance of a task undertaken in the public interest or for the fulfilment of a mission in the public interest. mission in the public interest or for the satisfaction of a legitimate interest, while verifying whether the legitimate grounds for processing outweigh your legitimate grounds for processing. |
| Portability | You may receive, in a structured, commonly used and readable format, the personal data that you have provided to us and those obtained from your contractual relationship with Rebellion. You may in turn request that your data be transferred directly to the other party where technically possible. |
| Objection | In certain circumstances and for reasons related to your particular situation, you may request that your personal data not be processed. Rebellion will stop processing the data except for compelling legitimate reasons, or the exercise or defence of possible claims. |

Not to be subject to automated decision-making

In cases where Rebellion carries out automated processing without human intervention, you have the right to have an operator intervene to explain the decision taken, to collect your comments on it and to challenge the decision taken.

If you have given us your consent to process your data for any purpose, you also have the right to withdraw your consent at any time, without affecting the lawfulness of the data processing performed to date.

If you have any questions about how we process your data or to exercise all these rights, you can write to us at the following email address: dataprotection@rebellionpay.com.

Finally, we inform you of your right to lodge a complaint with the relevant data protection supervisory authority, in particular with the Spanish Data Protection Agency (www.aepd.es).

Notwithstanding any administrative or extra-judicial remedy available, every data subject shall have the right to effective judicial protection where he or she considers that his or her rights under this Regulation have been infringed as a result of the processing of his or her personal data.

7. Data Protection Officer (DPO)

If you have any questions about how we process your personal data, you consider that it does not comply with the regulations or any other question about this Privacy Policy you can contact our Data Protection Officer (DPO) at the email address dataprotection@rebellionpay.com.

8. Data security

Protecting the privacy and personal data of users is very important to Rebellion. In order to guarantee the confidentiality, integrity, availability and authenticity of your data, we maintain security levels in accordance with current legislation and have implemented all the technical measures available to prevent the loss, misuse, alteration, unauthorised access or theft of this data.

We guarantee a secure service and serious control of the information you provide us with. Among the security measures we adopt are the following:

- We use 256-bit TLS encryption for our website and all communication services and databases: The same level of security used by the best banks.
- Our provider is Prepaid Financial Services (Ireland) Limited. The Financial Conduct Authority (FCA) regulates and authorises Prepaid Financial Services (Ireland) Limited as an Electronic Money Institution with registration number 900036.
- Your Rebellion card is issued by Prepaid Financial Services (Ireland)

Limited under licence from Mastercard® International Incorporated.

- Rebellion is not a bank but an Electronic Money Institution regulated at European level, and authorised to take deposits from customers throughout Europe. Rebellion's customer funds are segregated in Rebellion's accounts. This means that if the company were to go bankrupt, for example, the funds in clients' accounts would be shielded so that Rebellion would not be able to access these funds, but clients would be able to withdraw these funds.
- We verify login and registration by SMS. So only you can use the app from your mobile phone.
- We are GDPR compliant, so the information you provide to us follows Spanish regulations, one of the strictest regulations on user privacy and data protection.
- We use the most secure Amazon AWS infrastructure to host our cloud services. Our databases are replicated and we load balance as needed so you never run out of service.
- We make regular backups, so our systems don't lose data.

Although these measures are robust and we are constantly adding features that improve the security of our service, we understand that the User is ultimately responsible for contributing to the maintenance of the security and privacy of their data. Therefore, in order to be able to handle any breach of security that occurs in the shortest possible time, the User agrees to notify Rebellion as soon as possible of any unauthorised use of your username and/or password or any other breach of security that occurs.

Neither Rebellion nor any of our suppliers shall be liable for any damage or loss that may occur as a result of the User's failure to comply with this obligation.

9. Changes to the Privacy Policy

We may change the information contained in this Privacy Policy from time to time. If we do so, we will notify you in advance. In any case, we suggest that you review this Privacy Policy from time to time in case there are minor changes or we introduce any interactive improvements, taking advantage of the fact that you will always find it as a permanent point of information on our Website and our App.