



**Privacy policy.**



## Last updated: August 2023

This privacy policy (“Privacy Policy”) explains how personal information is collected, used, shared, and protected by Conotoxia, Inc. (“Conotoxia” or “Company”) when you access or use any website to which this Privacy Policy is posted or linked, including our website located at: <https://conotoxia.com/en-us>. Conotoxia’s Privacy Policy also describes the choices available to you regarding the use of, your access to, and how to update and correct your personal information. In this Privacy Policy, “you,” “your,” and “yourself” refer to the person who accesses or uses our Services. When we use the words, „personal information,” we are referring to information that personally identifies you.

This Privacy Policy is part of our Terms and Conditions available at <https://conotoxia.com/enus/terms-conditions>. If you do not agree to every provision of this Privacy Policy, our Terms and Conditions, you may OPT OUT by (i) clicking on the OPT OUT BOX and then (ii) by disengaging and refraining from further accessing, browsing, or using our Services.

## Application of this Privacy Policy

This Privacy Policy applies to your use of our Services (regardless of the means of access). You may use our Services via applications (“APP”) on any computer or mobile device, including, without limitation, a desktop computer, laptop, mobile phone, tablet, or other consumer electronic device (each, a “Device”).

## Information we may collect

### Information You Provide to Us

In general, you can visit our website and download our App without telling us who you are or revealing any personal information about yourself. When you contact us or provide information via our Services, such as when you register for a Conotoxia account, we may collect information that you provide to us. Such information may include your personal information, such as your name, street address, email address, mobile phone number, date of birth, and payment account information (collectively, your “Personal Information”). By providing your Personal Information to us, you expressly agree to our collection, use, and storage of your Personal Information as described in this Privacy Policy.

When you register for a Conotoxia account, we will ask you to create log-in credentials for your Conotoxia account, such as a username (email), password, and personal identification number (or “PIN”), as applicable.



## **Anti-Money Laundering and Counter-Terrorism Financing and Sanctions Statement**

Conotoxia is committed to preventing its Services from being used to facilitate money laundering, fraud or other financial crimes, including terrorist financing. To this end and to help the government fight the funding of terrorism, money laundering activities and other financial crime, Federal law requires all financial institutions to obtain, verify, and record information that identifies each person who uses their Services. In addition, to comply with the requirements of the Office of Foreign Asset Control (or “OFAC”), we screen your account against government watch lists. We, therefore, will request that you provide us with documentation to help prove your identity for verification purposes.

What this means for you: When you open an account, we will ask for your name, address, date of birth, and other information that will allow us to identify you. We also will ask to see a copy of your government-issued photo identification documentation such as a drivers’ license or passport. Other identity verification documentation also may be requested.

### **Information About Your Transactions**

We may collect information about the transactions you perform with our Services, such as the name, address and date of birth of the recipient of the money remittance.

### **Information from Third Parties**

We may collect information about you from other third parties to verify your identity, such as credit bureaus, consumer reporting agencies, identity verification services and publicly available services.

### **Information Collected Automatically**

We may automatically collect information from your Device when you use our Services. Such information includes information about your Device (such as the Device type, operating system, settings and system configurations, IP address, Device ID and other unique Device identifiers, and mobile network information) and your activity using our Services (such as data about the webpages you access, traffic to and from websites, the dates and times associated with transactions, web log data, and other event information, including crashes and system activity).

If we collect location information from your Device, we will notify you prior to this collection. You may control or disable the sharing of location information via your Device settings. If you disable location services, the performance of some of our Services may be limited or not to work at all.

Information that we collect automatically from your Device includes information that may identify you as well as statistical information that does not identify you. Some statistical information may be correlated with your Personal Information and your Conotoxia



Account.

## Information Collected Through Cookies and Similar Technologies

When you access or use our Services, we may place small data files on your Device that assign random, unique numbers to your Device to enable us to recognize your Device when you use our Services. These data files may be cookies, pixel tags, other local shared objects, or similar technologies provided by your browser or associated applications (collectively, “Cookies”). We use Cookies to recognize your Device, manage and store your settings and preferences for our Services, improve our Services, offer targeted products and services to you, and collect and analyze information about your use of our Services. We include our Cookie Policy below in greater detail.

## How we use information we collect

The use of your Personal Information is subject to this Privacy Policy and our Terms and Conditions. The provisions contained herein supersede all previous notices or statements regarding our privacy practices with respect to our Services.

We may use aggregated, non-Personal Information for research and commercial purposes, such as to improve our Services so that they are more useful and accessible to you.

We may use your Personal Information to:

- Provide our Services and notices related thereto
- Provide customer support for our Services
- Detect and protect against errors, fraud, or other criminal activity
- Resolve disputes and enforce our Terms and Conditions
- Collect fees and other amounts owed in connection with our Services
- Compare information for accuracy and verify it with third parties
- Analyze, customize, and improve our Services
- Deliver targeted marketing and promotional offers
- Contact you by email message, voice call, or text message, as authorized by our Terms and Conditions and subject to applicable law (please note that standard telephone minute, text message, and data charges may apply if we contact you, and you are responsible for such charges)

To assist you in completing the registration process and to avoid having to input again your personal information, we retain information.

## Remarketing

If you have used our website, our advertisements may be shown to you, among other things, on other websites or in Google search results. This is because we process your personal



data using the advertising functions of Google Analytics, and the recipient of your data is Google Ireland Limited as a provider of Google Ads (find out more about [how Google uses data collected from partner websites and applications](#)). The purpose of the processing is direct marketing of the Services provided on the website and our business. Processing for this purpose includes measuring or understanding the effectiveness of our marketing activities and tailoring content or marketing activities to you - profiling (automated assessment based on the personal data we hold about you). Such processing only takes place if you consent to it. You can give your consent by accepting cookies or other similar technologies used for marketing purposes on our website ([check your cookie settings](#)). You have the right to withdraw your consent at any time by changing these settings. For more information on how to manage cookies, please see the [Cookies Policy](#) which is an integral part of this Privacy Policy.

## How we share information

We do not share your Personal Information with: (i) other financial companies for joint marketing purposes; (ii) affiliated companies for their everyday business purposes; or (iii) any third parties so they can market to you, without your prior express consent.

We may share your Personal Information with unaffiliated third parties: (i) if you request or authorize it; (ii) if the information is provided to help complete a transaction; (iii) if the information is provided to: (A) comply with applicable laws, rules, regulations, governmental and quasi-governmental requests, court orders, or subpoenas, including, but not limited to, national security or law enforcement requirements; (B) enforce our Terms and Conditions or other agreements; or (C) protect our rights, property, or safety or the rights, property, or safety of our users or others (e.g., to a consumer reporting agency for fraud protection); (iv) if the disclosure is done as part of a purchase, transfer, or sale of services or assets (e.g., in the event that substantially all of our assets are acquired by another party, your Personal Information may be one of the transferred assets); (v) if the information is provided to our third-party vendors or service providers to perform functions on our behalf (e.g., analyzing data, providing marketing assistance, providing customer service, processing orders, etc.); provided, that our agreements with such third parties require them to only use your Personal Information to provide services on our behalf and not for their own benefit; (vi) for our everyday business purposes; or (vii) as permitted by applicable law or otherwise described in this Privacy Policy. In some cases, such third parties and their facilities may be located outside of the United States. Notice and opt-in consent will be required for any other form of disclosure outside the above-established exception pursuant to Vermont, Illinois and North Dakota regulations. When you are no longer our customer, we continue to share your information as described in this Privacy Policy.

We may disclose your public, aggregated, or otherwise non-Personal Information, such as usage statistics of our Services, to third parties.



## Accessing your personal information

You must notify us of any change in your Personal Information by updating your Conotoxia account profile through our Services. Any changes will affect only future uses of your Personal Information.

Subject to applicable law, which might, from time to time, oblige us to store your Personal Information for a certain period of time (typically five (5) years as required by regulatory recordkeeping retention rules), we will respect your wishes to correct inaccurate Personal Information. Otherwise, we will hold your Personal Information for as long as we believe it will help us achieve our objectives as detailed in this Privacy Policy.

You may ask us whether we are storing your Personal Information and you may ask to receive a copy of that Personal Information. Before sending you any of your Personal Information, we will ask you to provide proof of your identity. If you are unable to provide proof of your identity, we reserve the right to refuse to send you any Personal Information. We will respond as quickly as we can to your requests for details of Personal Information, we retain about you.

## Security

We have administrative, technical, and physical safeguards in place in our physical facilities and in our computer systems, databases, and communications networks that are reasonably designed to protect information contained within our systems from loss, misuse, or alteration. When your payment account information is transmitted via our Services it will be protected by encryption technology.

We care about the security of your information; however, no method of electronic transmission or storage is 100% secure. Therefore, we cannot guarantee the absolute security of your Personal Information as you also play a role in protecting your Personal Information. Please safeguard your username, password, and PIN for your Conotoxia account and do not share them with others. We reserve the right, in our sole discretion, to refuse to provide our Services, terminate Conotoxia accounts, and to remove or edit content and Personal Information to the extent permitted by applicable law.

## Links to third-party websites

When you use our Services, you may be directed to other websites that are beyond our control. We may also allow third-party websites and applications to link to our Services. We are not responsible for the privacy policies or practices of any third parties or the content of linked websites, but we do encourage before providing any information that you to read the applicable privacy policies and terms and conditions of such parties



or websites. This Privacy Policy only applies to our Services.

## Protecting children's privacy

We do not permit users to access our Services who are under the age of 13. As such, our Services are not designed nor intended to be attractive to children under the age of 13. We do not knowingly collect personal information from children under the age of 13. If you are under the age of 13, please do not access, use, or browse our Services or submit any personal information to us.

In the case of users under the age of 18, we do not profile their personal data for direct marketing purposes. On the other hand, if a minor user aged 16 consents to the transmission of marketing content, we may direct non-profiled marketing to him or her via the contact channel for which consent was given.

## International transfers

Your Personal Information may be stored on computers and systems in the United States and the European Union. By using our Services, you consent to the collection and processing of your Personal Information in the European Union (see link at: <https://conotoxia.com/about-us/privacy-policy>) and the United States.

## Cookies and similar technologies

When you use the services provided by us, we may also gather information such as technical data about the devices you use to access them and the approximate location of those devices, including your internet connection, IP address, or other technical details provided by your browser. Google Signals also allows us to obtain aggregated and anonymous information about the use of our services across devices, demographics and interests of users of our services (applicable only to users signed in to Google services who have consented to the personalisation of ads by Google). In addition, we process specific information about your use of our services, such as measurement data about when and how you use the services, traffic data, your transaction history list and the type of transactions you make. We collect data using cookies or similar technology. For more information, please refer to our Cookies Policy, which is an integral part of this Privacy Policy.

We are not responsible for the privacy policy of other websites, both those available through links placed on Conotoxia.com and those that place links to our website. Therefore, if you use external websites, we recommend that you review the relevant privacy policies posted on those websites.



## Changes or updates to our Privacy Policy

Subject to applicable law, we may amend this Privacy Policy at any time and in our discretion by updating and posting a new version via our Services or by otherwise notifying you of the revised terms. When we modify this Privacy Policy, we will post the revised version via our website and will update the date at the top of this Privacy Policy. Your use of our Services after any such change constitutes your unconditional agreement to this Privacy Policy, as amended. For this reason, we encourage you to frequently review our Privacy Policy.

## Dispute resolution

Any questions or concerns regarding the use or disclosure of personal information should be directed to us at the following email address: <https://conotoxia.com/en-us/money-transfer/contact-us>. We will investigate and attempt to resolve complaints and disputes regarding use and disclosure of personal information by reference to the principles contained in this Privacy Policy.

## Contacting us

If you have any questions regarding this Privacy Policy, or if you wish to ask us to delete, correct, or show you your Personal Information as provided above, please contact us at: <https://conotoxia.com/en-us/money-transfer/contact-us>.