

**THESE TERMS APPLY TO THE USE OF THE HELIO APP, SOLANA PAY, AND OTHER WHITE-LABELLED APPLICATIONS**

## **Privacy Policy**

This Privacy Policy describes HELIO's ("we", "our" or "us") policies and procedures regarding how your personal information is collected, used, and disclosed in connection with your use of the HELIO payment services (the "App") and any associated services, features, content, or applications we offer through the App (collectively, the "Services"). We receive information about you from various sources, including: (i) when you register for the App or the Services through your user Account (your "Account"); (ii) your use of the Services; and (iii) from third-party websites and services. When you use the Services, you agree to collect, use, and disclose your information as described in this Privacy Policy.

### **What Does This Privacy Policy Cover?**

This Privacy Policy explains the treatment of personally identifiable information ("Personal Information") gathered when you are using or accessing the Services. This Privacy Policy also covers our treatment of any Personal Information that our Business Partners share with us or that we share with our Business Partners.

### **What Information We May Collect**

We may collect information to personalise, improve, protect, and continue to operate the Services. We may request, collect and/or display some of your Personal Information. We may collect the following types of information from our users.

**Account Information:** If you create an Account on the Services ("Account"), you may be required to provide information that could be Personal Information, such as your name and email address. You acknowledge that the information we receive may be personal to you, and by creating an Account and providing Personal Information to us, you allow others, including us, to identify you. We may use your contact information to send you information about our Services. We may also request additional commercial and/or identification information from you, for example, if you send or receive certain high-value or needed items to comply with your anti-money laundering obligations under applicable law. You may unsubscribe from some of these messages by emailing us at [help@hel.io](mailto:help@hel.io), although we reserve the right to contact you when we believe it is necessary.

**Twitter Authentication:** If you choose to link your Twitter account to our Services using Twitter Authentication, you will be providing personal information to both our web application and Twitter. This may include your name, email address, and other information that you have made available to Twitter. We will use this information to provide you with our Services and to personalise your experience. Twitter will also collect, use, and disclose your information in accordance with its own privacy policy. By using Twitter Authentication, you agree to the collection, use, and disclosure of your information by both us and Twitter.

**KYC:** To provide Know Your Customer (KYC) functionality on our Services, we use Sumsb, a third-party service provider that collects and processes certain personal information from our users. This information may include but is not limited to, the user's full name and identification documents. The personal information collected through Sumsb will be used solely for the purpose of KYC verification and compliance with applicable legal and regulatory requirements. This information will be processed securely and in accordance with Sumsb's privacy policy and all applicable laws and regulations. We will also use this information internally to verify the identity of our users and ensure the security of our services. We process the personal information collected through Sumsb based on our legitimate interest in ensuring the security and integrity of our Services and complying with applicable legal and regulatory requirements. Users have the right to access, modify, and delete their personal information collected through Sumsb. They may also request that we restrict the processing of this information. To exercise these rights, users may contact us using the contact information provided at the end of this privacy policy.

**Information Regarding Third-Party Services:** You may interact with third-party applications while using the Service ("Third Party Service"). By interacting with or using these Third-Party Services, your interactions with those Third-Party Services are subject to the Third-Party Service's privacy policy. Therefore, we encourage you to read the privacy policies and other policies of any Third-Party Services.

**Third-Party Cookies and Tracking Technologies:** We may use third-party cookies, such as Google Analytics, for website traffic tracking and user targeting, which helps us to analyse how you use Helio's website. You can opt-out by setting your browser to refuse some or all third-party cookies or be notified when a website tries to set a cookie in your browser. If you choose to disable cookies in your browser, you can still use the Helio site, but the availability to use some of the features may be affected. Click [here](#) for more information on how to opt out of Google Analytics tracking.

**Personal Information Retention:** We keep your information no longer than necessary for processing. The length of time for which we retain information depends on the purposes we collect and use and/or as required to comply with applicable laws.

**Other Information Collected:** We may collect technical and usage information, such as the IP address used to connect your computer to the Internet, the number and frequency of visitors to the App and users of the Services. We may use this data in aggregate form, that is, as a statistical measure, or in other anonymous forms, but not in a manner that would identify you personally. This type of data enables us, and third parties authorised by us, to figure out how often individuals use parts of the Services.

**Email Communications:** We may send you communications via email (sharing your email address is optional when using our Services). We may gather information about these communications, such as email opens and click rates. When you use our Services and provide your email address, you consent to receive such communications, which may include customer service notifications, newsletters, and more.

**Aggregate Information:** We collect statistical information about how both unregistered and registered users use the Services (“Aggregate Information”). Some of this information is derived from Personal Information. This statistical information is not Personal Information and cannot be tied back to you, your Account, or your web browser.

## **Use of Your Personal Information**

The following is how we use your personal information:

- to fulfil our obligations under your contract with us and provide you with the information and services you have requested.
- to adhere to any legal and/or regulatory obligations that may apply.
- to keep you up to date on changes to our Services.
- as part of our ongoing efforts to ensure the safety and security of our Services.
- to administer our Services and for internal operations, such as troubleshooting, data analysis, testing, research, statistical, and survey purposes; to improve our Services and ensure that they are presented most effectively.
- to determine the efficacy of the ads we serve and to provide you with relevant advertising.
- to enable you to take part in interactive aspects of our Services if you so desire.
- to notify you about other similar items and services that we provide.
- to provide you with information about goods or services we think you might be interested in,
- to allow selected third parties to provide you with information about goods or services we think you might be interested in, or to combine information we get from other sources with information you give us and information we collect about you.

## **Sharing of Information**

We may share personal information in the following circumstances :

- We engage vendors, service providers, and consultants who need to access certain personal information to provide services for Helio Fintech Ltd, such as support in website hosting, systems monitoring, fraud prevention, identity verification, customer service, and marketing efforts.
- Your personal information may be disclosed if we determine that such disclosure is necessary to comply with applicable laws or legal processes, or to respond to requests from public authorities, including meeting law enforcement requirements.
- We reserve the right to share your personal information if we believe your actions do not align with our user agreements or policies, if we suspect you have broken the law, or to protect the rights, property, and safety of Helio Fintech Ltd, our users, and the public.
- Information may be shared with our legal and professional advisors as necessary to secure legal advice or protect the company’s business interests.

In addition to the aforementioned, we may share aggregated or de-identified information that cannot be used to identify you personally.

### **International Data Transfer**

Our Services are operated primarily in the United Kingdom, and the recipients of the data disclosures described in this Privacy Policy are in the United Kingdom and elsewhere in the world. We will comply with legal requirements and will take all steps reasonably necessary to ensure that your data is treated securely for cross-border data protection.

### **Your Data Protection Rights**

You can decline to submit information through the Services, in which case we may not be able to provide certain services to you. You have the right to access the information we have on you, subject to relevant laws. You can exercise your right of access in line with the applicable data protection legislation. You can ask us to delete your data when it's no longer necessary or subject to a legal obligation to which Helio is subject. By emailing us at [help@hel.io](mailto:help@hel.io), you may ask us not to contact you for marketing reasons.

EEA and UK: Residents of the European Economic Area ("EEA"), and the United Kingdom can contact us as described below to exercise their rights within the scope of the General Data Protection Regulation (GDPR).

California Privacy Rights: California law permits users who are California residents to request and obtain from us once a year, free of charge, a list of the third parties to whom we have disclosed their personal information (if any) for their direct marketing purposes in the prior calendar year, as well as the types of personal information disclosed to those parties. If you are a California resident and would like to request this information, please mail your request to Helio Fintech Ltd., 16 Great Queen Street, WC2B 5AH, London/UK.

### **Changes**

We may update this privacy policy from time to time to reflect, for example, changes to our practices or for other operational, legal, or regulatory reasons. We will endeavour to provide you with reasonable notice of such changes. We may do so via prominent notice in the Service or to your email address of record, and where required by law, we will obtain your consent or allow you to opt out of such changes.

### **Contact Us**

For more information about our privacy practices, if you have any questions, or if you would like to make a complaint, please contact us by email at [privacy@hel.io](mailto:privacy@hel.io) or by mail using the details below:

Helio Fintech Ltd.

16 Great Queen Street

London

WC2B 5AH

UK