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Privacy Policy

COMPANY	Docree Demo Payments Ltd
REGISTRATION	HE 000000
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SECTION 01

Introduction & Controller

1.1 Docree Demo Payments (the "Company") acts as a data controller for merchant account data and a data processor for cardholder payment data processed on behalf of merchants. This Privacy Policy describes how we handle personal data under applicable data protection laws and regulations.

SECTION 02

Data We Collect

2.1 Merchant account data (Company is Controller):

- Business name, registration number, operating address, website.
- UBOs and directors' names, dates of birth, IDs, addresses.
- Bank account details, financial statements.
- Login credentials, API keys, device information.

2.2 Cardholder transaction data (Company is Processor):

- Card number (tokenized), expiry, cardholder name, billing address.
- Transaction amount, currency, merchant descriptor, timestamp.
- IP address, device fingerprint, 3DS authentication results.
- Email address (for receipts), shipping address (for physical goods).

SECTION 03

Purposes of Processing

- Onboarding and KYB/KYC verification of merchants.
- Authorization, clearing, and settlement of card transactions.
- Fraud prevention and transaction monitoring.
- Compliance with AML, sanctions, and regulatory reporting obligations.
- Chargeback and dispute processing.
- Customer support and operational communications.

- Service improvement, analytics, and product development.

SECTION 04

Legal Bases

Contract performance

Processing payments and providing merchant services.

Legal obligation

AML/KYC, tax reporting, sanctions screening, SARs.

Legitimate interest

Fraud prevention, security monitoring, product development.

Consent

Optional marketing, non-essential analytics.

SECTION 05

Data Sharing & Sub-Processors

5.1 We share data with:

- Card networks (Visa, Mastercard, Amex, Discover) for transaction routing.
- Acquiring banks and issuing banks involved in settlement.
- KYB/KYC identity verification providers.
- Fraud-prevention and blockchain-analytics providers.
- Cloud infrastructure providers (AWS, Google Cloud, or equivalent).
- Regulators, law enforcement, and auditors as required by law.

5.2 A current list of sub-processors is available on the Company's website. We impose contractual data-protection obligations on all sub-processors.

SECTION 06

Retention

6.1 Personal data is retained for as long as required to provide services and meet legal obligations. Typical retention periods:

Data Type	Retention
Merchant KYB records	7 years after account closure
Transaction data	5-7 years per tax/AML law
Tokenized card data	Until token expiry or merchant request
Support tickets & communications	3 years
Marketing preferences	Until consent withdrawn

SECTION 07

Your Rights

7.1 Subject to applicable law, data subjects may exercise rights including access, rectification, erasure, restriction, portability, and objection. Cardholders should typically exercise these rights via the merchant that processed their transaction.

7.2 To exercise your rights or contact our Data Protection Officer, email dpo@docree.com.

SECTION 08

Security & International Transfers

8.1 The Company maintains PCI DSS compliance, encryption in transit and at rest, strict access controls, and continuous security monitoring. Card data is tokenized and stored in compliance with PCI requirements.

8.2 Personal data may be transferred internationally to service providers and regulators. Transfers outside the EEA/UK rely on Standard Contractual Clauses or adequacy decisions.

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DPO Contact	dpo@docree.com

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