

## Privacy Policy

Effective Date: 1 July 2025

### Introduction

**APZONE LIMITED** ("we", "our", or "us") is committed to protecting the privacy and security of your personal data. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal data when you visit our website <https://remozo.com>, including any other media form, media channel, mobile website, or mobile application related or connected thereto (collectively, the "Site"). Please read this Privacy Policy carefully. If you do not agree with the terms of this Privacy Policy, please do not access the site. If you are under 18 years old you should not access our services and provide us with your personal information.

For the purposes of fulfilling our contractual obligations to you, **Chainroll Limited** shall be considered the **data processor**, acting on behalf of and under the instructions of **APZONE LIMITED**, which remains the data controller in relation to your personal data

### Information We Collect

We may collect personal information about you in various ways when you use our website. This information may include:

- **Contact details:** full name, email address, phone number, postal address
- **Payment details:** bank account information, transaction amounts, payment method
- **Technical data:** IP address; browser type and version; device type and model; operating system and its version; referring URL; date and time of access; language and time zone settings; screen resolution; on-site activity (e.g. pages visited, clicks, scroll behavior); cookie and session identifiers

### Payment Card Industry Data Security Standard (PCI DSS) Compliance

We do not store your payment card information. Your payment card information is securely stored with payment services providers in compliance with PCI DSS.

### How We Use Your Information

We may use the information we collect for various purposes, including:

- To provide the relevant services to you under our public offer, to operate, and maintain our website.
- To improve, personalize, and expand our website's content and functionality.
- To understand and analyze how you use our website.
- To communicate with you, either directly or through one of our partners.

## Legal Basis for Processing Personal Data

We will only process your personal data if we have a lawful basis for doing so under the laws of the Republic of Cyprus, the General Data Protection Regulation (“GDPR”) and other legal acts. Such lawful bases may include:

- The processing is necessary for the performance of a contract with you.
- The processing is necessary for compliance with a legal obligation.
- You have given consent to the processing of your personal data for one or more specific purposes.

We only use your information in a lawful, transparent, and fair manner. Depending on the specific personal data concerned and the factual context, when we process personal data as a controller for individuals in regions such as the EEA, Switzerland, and the UK, we rely on the following legal bases as applicable in your jurisdiction:

- As necessary for our contract. When we enter into a contract directly with you, we process your personal data on the basis of our contract in order to prepare and enter into the contract, as well as to perform and manage our contract (i.e., providing our products and services, features and services to account owners, their users, and managing our relationship and contract, including billing, compliance with contractual obligations, and related administration). If we do not process your personal data for these purposes, we may not be able to provide you with all products and services;
- Consistent with specific revocable consents. We rely on your prior consent in order to utilize cookies to engage advertising and analytics partners to deliver tailored advertising and analysis of our website usage. You have the right to withdraw your consent at any time;
- As necessary to comply with our legal obligations. We process your personal data to comply with the legal obligations to which we are subject for the purposes of compliance with EEA laws, regulations, codes of practice, guidelines, or rules applicable to us, and for responses to requests from, and other communications with, competent EEA public, governmental, judicial, or other regulatory authorities. This includes detecting, investigating, preventing, and stopping fraudulent, harmful, unauthorized, or illegal activity (“fraud and abuse detection”) and compliance with privacy laws;
- To protect your vital interests or those of others. We process certain personal data in order to protect vital interests for the purpose of detecting and preventing illicit activities that impact vital interests and public safety, including child sexual abuse material; and
- As necessary for our (or others’) legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms, which require protection of personal data: We process your personal data based on such legitimate interests to (i) enter and perform the contract with the account owner and/or reseller providing you with the products and services (which includes billing, compliance with contractual obligations, and related administration and support); (ii) develop, test, and improve our products and services and troubleshoot products and services; (iii) ensure authentication, integrity, security, and safety of accounts, activity, and products and services, including detect and prevent malicious conduct and violations of our terms and policies, prevent or investigate bad or unsafe experiences, and address security threats; (iv) send marketing communications, advertising, and promotions related to the products and services; and (v) comply with non-EEA laws, regulations, codes of practice, guidelines, or rules applicable to us and respond to requests from, and other communications with, competent non-EEA public, governmental, judicial, or other

regulatory authorities, as well as meet our corporate and social responsibility commitments, protect our rights and property and the ones of our customers, resolve disputes, and enforce agreements.

## **Data Sharing and Disclosure**

We receive your personal data in order to carry out requests and provide services, and to perform our contractual and legal obligations.

We will not share personal data with third parties unless this is necessary for our legitimate business needs, to carry out requests, provide services and/or as required or permitted by law. Third parties under these circumstances include:

- Our affiliates, subsidiaries, and parent companies.
- Service providers. We will disclose personal data to third party partners and service providers (processors) so they can process it on our behalf where required. These service providers are required to provide sufficient assurances in accordance with data protection law. (e.g. being bound contractually to confidentiality and data protection obligations). We will only share personal data necessary for them to provide their services.
- Auditors, advisors and consultants. We may disclose personal data for purposes and in the context of audits (e.g. external audits, security audits), to legal and other advisors, in order to investigate security issues, risks, complaints etc.
- Regulatory authorities, law enforcement, courts. We may disclose personal data to comply with applicable legislation, regulatory obligations, to respond to requests of regulatory authorities, government and law enforcement agencies, courts and court orders.
- Other persons. Other recipients may be any person/legal entity/organization for which you ask your data to be transferred to (e.g. reference etc.) or give your consent to transfer personal data.

As such, personal data may be transferred and disclosed to:

- Money laundering and fraud prevention agencies, compliance services and risk prevention services. This is required in order to verify your identity, ensure protection against fraud, and confirm eligibility for our services/products.
- Banks (other credit and financial service institutions), and similar institutions. These enable us to provide our Services.
- Payment Systems (SWIFT, SEPA, Visa, Mastercard, etc.), payment service providers, card processing companies. These enable us to provide our Services.
- Data management, storage, archiving, cloud storage service providers.
- Companies assisting us with provision of our services (e.g. technological services, solutions, support such as support/maintenance/development of IT applications, technology, website management, telephony/SMS services).
- Customer support service providers and marketing service providers.
- Administrative service providers.
- Auditing and accounting services and consultants.
- External legal advisors.

We may also disclose your data in circumstances such as the following:

- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request,
- In order to apply or enforce the terms and conditions or any other agreement in place in the context of our relationship and to investigate potential breaches,
- In order to protect our rights, safety or property, or that of our customers or third parties/the public.
- This includes exchanging information with other companies and organizations for the purposes of money laundering, fraud prevention and equivalent risks.

### **Transfers outside the EEA or to international organizations**

Your personal data may be transferred to third countries (outside the EEA) or to international organizations if the transfer is necessary and has a legal basis as described in this document. Such transfers take place for example:

- When it is necessary to carry out in the context of the Services;
- Under applicable law;
- On the basis of your instructions or consent.

In the context of data processing undertaken by third parties on our behalf. (e.g. the data may also be processed by staff operating outside of the EEA who work for us or for one of our third-party service providers. Such staff may be performing technical duties and support, duties related to processing of your orders, provision of support services etc.).

The processors (or controllers) in third countries in this case shall be either approved by the European Commission as providing adequate level of data protection or shall have in place appropriate safeguards with the level of data protection in the EU. We aim to take all steps reasonably necessary to ensure that your data is treated securely.

### **Cookies and Tracking Technologies**

We may use cookies and similar tracking technologies to track the activity on our website and hold certain information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent.

### **Your Data Protection Rights**

Under the GDPR, you have certain data protection rights, including:

- The right to access, update, or delete the personal data we have about you.
- The right to restrict or object to our processing of your personal data.
- The right to data portability.

If you are in the EEA, Switzerland, or the UK, your rights in relation to your personal data processed by us as a controller specifically include:

- Right of access and/or portability. You have the right to access any personal data that we hold about you and, in some circumstances, have that data provided to you so that you can provide or “port” that data to another provider;
- Right of erasure. In certain circumstances, you have the right to the erasure of personal data that we hold about you (for example, if it is no longer necessary for the purposes for which it was originally collected);
- Right to object to processing. In certain circumstances, you have the right to request that we stop processing your personal data and/or stop sending you marketing communications;
- Right to rectification. You have the right to require us to correct any inaccurate or incomplete personal data;
- Right to restrict processing: You have the right to request that we restrict processing of your personal data in certain circumstances (for example, where you believe that the personal data we hold about you is not accurate or lawfully held).

Please note that your rights under the GDPR does not release us from our obligations under applicable Anti-Money Laundering legislation and our policy in this regard. For more information please read our Anti-Money Laundering (AML) and Know Your Client (KYC) Policy.

### **Data Security**

We take appropriate measures to protect your personal data from unauthorized access, alteration, disclosure, or destruction.

### **Changes to This Privacy Policy**

To keep up with changing legislation, best practice and changes in how we process personal information, we may update this Privacy Policy from time to time when required, in order to take current circumstances into account. We will notify you of any changes by posting the new Privacy Policy on this page.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us at [info@remozo.com](mailto:info@remozo.com) .

### **Effective Date**

This Privacy Policy is effective on Effective Date.