PRIVACY POLICY

Fortelis Privacy Policy

ABOUT FORTELIS

Secure Nordic Payments, UAB, a private limited liability company, established and operating under Lithuanian law, legal entity code 303262295, registered address at Perkūnkiemio str. 2, Vilnius, the Republic of Lithuania, is an electronic money institution which is considered as Data Controller for the purposes of this Privacy policy.

DEFINITIONS

The following definitions when used in this Privacy policy have the following meanings:

Account or Fortelis Account has the meaning of the account created by Fortelis to the Client;

Client has the meaning of an individual or legal entity holding Fortelis Account;

Mobile APP has the meaning of Fortelis mobile applications used for provision of Services.

Privacy Policy has the meaning of this privacy policy;

Personal data has the meaning of information that can be used to identify you directly or indirectly.

Services has the meaning of the services provided by Fortelis to its Clients;

Fortelis has the meaning prescribed in Art. 1 of this Privacy Policy;

Website or Fortelis Website has the meaning of the website available at https://www.Fortelis.com;

We have the meaning of Fortelis;

You have the meaning of the person whose Personal data is processed by Fortelis.

SCOPE OF PRIVACY POLICY

This Privacy Policy describes how Fortelis collects, uses, stores, shares, and protects your Personal Data whenever you use Services through the Website or Fortelis Mobile APP or by corresponding with us (for example by email or by filling massaging form on the Website).

Personal data collected by Fortelis are processed in accordance with the Law on Legal Protection of Personal Data of the Republic of Lithuania, the General Data Protection Regulation, and other legal acts. All employees, agents, and employees of the agents of Fortelis who know the secret of Personal data must keep it safe even after termination of the employment or contractual relationship.

For the processing Personal data, Fortelis may engage data processors and/or, at its sole discretion, hire other persons to perform certain functions on behalf of Fortelis. In such cases, Fortelis shall take necessary measures to ensure that such data is processed by the Personal data processors in accordance with instructions of Fortelis and applicable legislation. Fortelis shall also require the Personal data processors to implement appropriate measures for the security of Personal data. In such cases, Fortelis shall ensure that such persons will be subject to the non-disclosure obligation and will not be able to use this information for any other purpose, except to the extent necessary to perform the functions assigned to them.

We assume that you have carefully read this document and accepted it. If you do not agree with this Privacy Policy, then you should refrain from using our Services or opening an Account. This Privacy Policy is an integral part of Fortelis·s Terms of Use.

We may change this Privacy Policy from time to time. We will post any Privacy Policy changes on Website and Mobile APP additionally sending you an email informing about changes made. Continued use of Fortelis·s Website and/or Mobile APP implies your acceptance of the revised Privacy Policy.

Fortelis respects the individual's right to privacy and makes all reasonable efforts to ensure the security and confidentiality of Personal data and other information processed on this Website and Mobile App.

You can visit this Website not providing any information about yourself, however, if You want to open an account in the Fortelis system and/or use other payment services offered by Fortelis, Fortelis will ask you to provide Personal data indicated in the system and to carry out established identification procedures.

Fortelis reserves the right, at its sole discretion to alter the provisions of the present Privacy Policy, therefore, when visiting this website, you have a responsibility to make sure that you are familiar with the latest version of the Privacy Policy that applies to you at the time you are visiting the website.

PERSONAL DATA WE COLLECT

General

To provide You with Fortelis Account and Services thereof, Fortelis is bound by law to establish and verify your identity prior to entering financial services transactions with you, also,

at the time of the provision of the services, to request further information, as well as assess and store this information for the retention period set out by legislation. Taking this into account, you must provide correct and complete information.
Personal Data is collected and used during 3 principal steps: registration, identity verification and the use of Fortelis Account and Services.
Processing of registration data

In the registration process we collect your email address and telephone number. Submission of herein mentioned Personal data is mandatory for your registration. Failure to provide your email address/telephone number or decision to delete or object to processing of email address/telephone number will result in dismissal of your registration.

Finalizing your registration you will have to confirm your email address provided after the respective message is sent to it.

After providing Personal data for registration you can continue with an application for opening the Account. For this purpose we need to request more information to meet legal and regulatory obligations. Therefore proceeding with the Account opening you should provide us your additional Personal Data, which may include data as such: Name, Surname, Date of birth, personal code, Residential Address, Correspondence address for delivery of Debit Card (if different from residential address), mobile phone number, ID document number (national identification card/Passport Number/Itinerary document), ID document number expiry Date, Nationality, Occupation, Source of Funds, account number, copy of identification document (ID/Passport/Itinerary document), photo, signature, IP address, and any other information you provide us in order to prove your eligibility to use our services. Submission of herein mentioned Personal data is mandatory for Account to be created and opened. Failure to provide mentioned Personal data will lead to dismissal of application for account opening.

To open the Account we need to know what expected activities on it are. Therefore during the process of opening your Fortelis Account you must determine and indicate such activities and provide details of it. Such information is collected and processed to comply with legal and regulatory obligations. Sometimes we need to request more information to identify you or to meet legal and regulatory obligations. When that is necessary, you will be prompted to provide such information.
If you contact us, we will keep a record of that correspondence (i.e. date of the letter, subject, the content of the correspondence).

Personal data collected by Fortelis in the Registration step is used for the following purposes:
Account opening;

Client identification;
Client risk assessment mandatory under the applicable laws;
To provide Clients with support, letting them know about upcoming changes or improvements of Website and/or Mobile APP;
Provide Clients with information regarding changes of any terms or conditions applicable to them or Services they use as well as other important information.

Fortelis processes Client's registration data on the legal basis of:
Your consent, expressed when voluntarily submitting your Personal Data details which are not mandatory;

and Conclusion and performance of contractual arrangements and obligations between Fortelis and the Client;

for compliance with a legal obligation to which Fortelis is subject.
You may at any time edit, update, or delete your contact details contacting our service center via e-mail support.fortelis.com. Please note that you will be able to request deletion of your contact details and other registration data only if there is no legal obligation for Fortelis to preserve such data by the applicable laws.

Processing of Client verification data
For the Account to be created you must verify your identity. We verify you by the Personal data you provide during registration. However such Personal data must be confirmed, therefore in addition, for verification purposes we also rely on verification services, managed, and provided to us by our service providers.

While exercising this verification step, you will be requested to upload your ID document. You will undergo facial verification. For the mentioned purposes we receive and rely on a certain confirmation from our service providers that your identity is verified. Please note, that under the applicable laws Fortelis is obligated to collect and store all data received during Client identification and verification process therefore scanned copies of ID documents, data related to facial recognition and other information will be stored by Fortelis in accordance with this Privacy policy and applicable legislation.

Fortelis may request to provide further information (i. e. information on participation in politics (through enhanced customer identification, a bank statement) that will allow Fortelis to reasonably identify you and verify your identity. Fortelis reserves the right to contact you and request to provide more information or approve that provided information is up-to-date and valid.
Fortelis processes the above-mentioned Personal data used for Client's verification to comply with regulatory and legal obligations as well as to ensure that Clients are not

attempting to create additional Accounts or to commit fraudulent actions. Refusal to undergo ID and facial verification will terminate your Account opening process.

Processing of your ID document, facial verification data, uploaded to a third-party database as described above, is covered by third parties' privacy policies. All Personal data you provide for the verification process shall be provided directly by you to our service provider performing your verification and therefore processing of such data shall be covered by the policies of such service provider. You should carefully review privacy policies of such Service providers before starting the verification process.

Processing of data generated while using our Mobile App

To provide quality user experience for you we create a possibility to use our Services through the Mobile App. While you are using our Mobile App we collect and process (but not limited to): your login history for the security purposes.

history and other information of your actions while using Mobile app to: (i) ensure the functionality of Mobile App and to provide further updates and improvements, (ii) ensure compliance with a legal obligation.

device geolocation.

IP address.

device info (name, model, operating system, unique ID).4.5. Processing of data generated while using Fortelis Account

While you are using our Services and Account, we are collecting the following information:

History of transactions (date, information of payer and payee, i. e. name, surname, account number, purpose of transaction, amount of transaction) is processed to: (i) ensure the functionality of Mobile App and to provide further updates and improvements, (ii) ensure compliance with a legal obligation;

Messaging history, including, but not limited to, claims and complaints made by you is processed due to the performance of obligations regarding provision of Services, our responses to you, names of messages, the dates of messages. Please note that we identify you by email, which you have submitted during the registration process. When you submit your request, always provide your email. In other case we will not be able to identify you properly and submit the information requested by you or to fulfil your request;

Your behavior while using Account (your clicks, visited sections) to ensure the improvements of functionality of Website;

Your payment card information: date of issue and expiry date to provide you Services;

Massage content: if you include a message with your payments, the content of that massage is stored by Fortelis;

Cookies: like most Websites and mobile applications we use cookies. Please see information on cookies we use in our cookie policy .

Fortelis processes Personal Data collected while using Services and Account on the following legal basis:

Conclusion and performance of contractual arrangements and obligations between Fortelis and the Client; and

Pursuance of legitimate interests of Fortelis, as controller and manager of Webpage platform;

for compliance with a legal obligation to which Fortelis is subject.

Personal data of other individuals

In providing personal data of any individual other than yourself to us during the use of our Services, you agree that you have obtained consent from such individual to disclose their personal data for collection and use. By providing such Personal data to us you bear all the responsibility towards such individuals if you have not received proper consents for such provision and you undertake to indemnify us for any liability which may appear due to unlawful provision and/or disclosure of personal data.

OTHER PURPOSES FOR USE OF PERSONAL DATA

Developing the Website and Mobile App

We use Personal data to conduct research and development of our Website, Mobile App and Services to provide you and others with a better, more intuitive, and personalized experience, driving membership growth.

Client support

We use Personal data to keep in touch with you to provide you with customer service, notify you on news and updates, and provide you with security notices or information.

Security and investigations

We use Personal data for security, fraud prevention and investigations. We use your Personal data (including your communications) if we think it is necessary for security purposes or to investigate possible fraud or other violations of our Terms of Services, this Privacy Policy, implementing the regulatory and legal obligations. We may ask you to provide any additional information which we think may influence the process of investigation or examination of your complaint / request.

Profiling

Profiling carried out by Fortelis involves processing of personal data by automated means for the purposes of legislation relating to risk management and continuous and periodic monitoring of transactions to prevent fraud. Such ongoing profiling is based on legitimate interests of Fortelis, the performance of a legal obligation and the execution of the agreement.

Providing information on similar products and services

When you sign up to Fortelis, we give you the opportunity to opt in to offers and

promotions. If you choose to opt in, we then use your data to tailor offers to you, so they are more likely to interest you. You can opt out again at any time by going to the Settings in your app or browser. You can adjust your preferences or tell us you do not want to hear from us, at any time. We will not pass your details on to any outside organizations for their marketing purposes without your permission.

When we use social media for marketing, your information may be shared with social media platforms, who may use it to check if you also hold an account with them. If you do, we may ask the advertising partner or social-media provider to:

use your information to send our adverts to you when we think you might like one of our new products;

not send you our adverts, because you already used the service advertised;

advertise to people with a similar profile to you (e.g. if one of our services might appeal to someone with interests like yours).

If you want us to stop sharing your personal information for marketing purposes, just let us know via the Fortelis website or app, or by emailing dpo@fortelis.com. You can also manage your marketing preferences directly with the social media platforms you are signed up to.

Third Party Information

We will combine this information with information we have collected about you and we will use this information to help us better understand your financial circumstances and behavior so that we may make decisions about how we manage your Account and to decide about whether to agree to approve application on Account opening.

PERSONAL DATA RECEIVED FROM THIRD PARTIES

We collect and receive your Personal data from yourself, as well as from the following sources:

We work closely with third parties to help us deliver our Service to you. These third parties are business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, fraud prevention agencies, customer service providers and developers. Information we may collect about you from such parties can include credit search information, information which helps us to verify your identity or information relating to your payment transactions.

Other legal sources, such as public registers, internet search engines, public sources such as social media.

If you are a beneficial owner, shareholder, representative or employee of our corporate client we are collecting your Personal data to fulfill legal and regulatory obligations. Your Personal data is provided to us by the representatives of the company where you hold a certain position.

Personal data received under this clause is processed in accordance with the provisions of this Privacy policy and you have all the rights of the Data subject listed herein in this Privacy policy

and in the applicable laws.

HOW WE SHARE PERSONAL DATA

To provide you with the Services and meet our legal and regulatory obligations, we use third parties' services, and such third parties use personal data in delivering their services to us. Therefore we may share the information we collect about you with our service providers (Data processors) such as:

Cloud storage/servers' providers. We use their service to store your data safely and securely.

Card issuing institutions. For providing you with a card to use our Services.

Identification and verification services providers – to verify your identity.

Auditors, accountants, and lawyers: To complete financial, technical, and legal audits of Fortelis operations, we may need to share information about your Account as part of such an audit.

Other service providers with which we have concluded service provision agreements or when such sharing is mandatory according to applicable law.

We only use the services of those data processors which ensure safeguards and use technical and organizational security measures equivalent to the ones required by EU General Data Protection Regulation.

Processing personal data inside and outside the EEA

The data that we collect from you will be transferred to, and stored at, a destination inside the European Economic Area (EEA).

Personal data may be processed outside of the EEA for us to fulfill our contractual obligations towards you to provide the Services. We will need to process your personal data for us, for example, to action a request made by you to execute an international payment, process your payment details, provide global anti-money laundering, and counter terrorist financing solutions and provide ongoing support services. We will take all steps to ensure that your data is treated securely and in accordance with this privacy policy.

Our Legal Obligation to Use or Disclose Personal Data

As a regulated financial institution, we may need to share your Personal Data to state and public authorities. We will only do so when we are legally required to provide information or when we need to take legal action to defend our rights, as well as the cases, where we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to meet any applicable law, regulation, legal process or enforceable governmental request, enforce applicable Terms of Services, including investigation of potential violations, detect, prevent or otherwise address fraud, security or technical issues.

Other Fortelis may partner with other financial institutions, such as Banking, credit, and financial services partners, including banking partners, banking intermediaries, credit companies and international payments services providers. With their help we can provide you Services and to

meet legal and regulatory requirements we might be obligated to share your account details with such partners to the extent you transact or interact with customers of such partners.

YOUR RIGHTS

You are entitled to the following rights regarding the protection of your Personal Data:
The right to request access information we process about you: this right enables you to receive a copy of the personal data we hold about you;
The right to request to correct incorrect / inaccurate information about you: this right enables you to have any incomplete or inaccurate Personal data we hold about you to be corrected. Please note that we may need to verify the accuracy of the new data you provide to us.
The right to request to transfer all or part of the Personal data: This right enables you to ask us to provide you with your Personal data in a structured, commonly used, machine-readable format, which you can then transfer to another appropriate data controller. Note that this right only applies to automated information which you initially provided for us to use and consented for its use or where we used the information to perform a contract with you.
o The right to request erasure of Personal data: This right enables you to ask us to delete or remove personal data where there is no good reason for us to process it, or if you have successfully exercised your right to object to processing (as described in clause 9.1 herein below). Please note that Fortelis as a regulated financial institution is obligated under the applicable laws regarding prevention of money laundering and terrorist financing as well as of Law on Electronic Money and Electronic Money Institutions of the Republic of Lithuania to retain certain information you have provided for several years, as indicated in certain legislation, therefore we may not always be able to comply with your request of erasure for the mentioned reasons. We will notify you at the time of your request if the situation is as described.
The right to request restriction of data processing: This right enables you to ask us to suspend the processing of your personal data in the following cases: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c)

where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Please note that such requests may lead to a situation that we may not be able to perform our contractual obligations towards you or enter a contract with you. If this would be the case, we will notify you about it.
The right to object to processing of Personal Data when processing is carried out based on legitimate interest: This right can be exercised in a situation where we are relying on our legitimate interest (or those of a third party) but in your situation such processing impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. Please note that Fortelis as a regulated financial institution is obligated under the applicable laws regarding prevention of

money laundering and terrorist financing as well as of Law on Electronic Money and Electronic Money Institutions of the Republic of Lithuania to process your certain Personal data for compliance purposes, therefore in some cases, we may demonstrate that we have compelling legitimate grounds to process your Personal data which override your rights. Please note that requirements of the mentioned laws supersede any right to objection under applicable data protection laws. If you object to the processing of certain data, then we may not be able to provide you Services and it is likely we will have to terminate your account.
To exercise any of the rights mentioned above, please reach out to our client support team via email by filling out a request form on our Website or contact our Data Protection Officer as indicated below. We may ask you to verify your identity and for more information regarding your request.

HOW LONG DO WE KEEP YOUR DATA

Fortelis as a regulated financial institution is obligated under the applicable laws regarding prevention of money laundering and terrorist financing as well as of Law on Electronic Money and Electronic Money Institutions of the Republic of Lithuania to retain your Personal data for several years:
Client identification data and verification data – eight years after termination of the contract relations in accordance with the Law of the Republic of Lithuania on the Prevention of Money Laundering and Terrorist Financing;
History of transactions – five years after terminations of the contract relations in accordance with the Law of the Republic of Lithuania on the Electronic Money and Electronic Money Institutions.
We therefore use this retention requirement as a benchmark for all personal data that we receive from you. To not hold your information for longer than is strictly necessary we will not hold any of your personal data for more than 8 years after the termination of our business relationship.

COMPLAINTS

You have the right to lodge a complaint to the national Data Protection Agency (DPA) in the country of residence in the event where your rights may have been infringed. We would, however, appreciate the

chance to deal with your concerns before you approach the DPA and find a solution at your satisfaction. So please contact us in the first instance.
Please be noticed that Fortelis identifies you by personal data and e-mail, which you have provided to Fortelis when you signed up for the services. When you submit your request, always provide your personal details and send your request via email you have submitted when you signed up for the services. In other cases we will not be able to identify you properly and

submit the information requested by you or to fulfil your request.

FORTELIS·S DATA PROTECTION OFFICER

Contact email: dpo@fortelis.com who are responsible for matters relating to privacy and data protection.

If you have any further questions regarding the Personal data Fortelis collects, or how we use it, then please feel free to contact the Data Protection Officer at the details as indicated above hereof.



Fortelis is a brand of Secure Nordic Payments, with its main office in Vilnius, Lithuania.

Fortelis.com yra registruota kaip elektroninių pinigų įstaiga (EPĮ) ir yra reguliuojama Lietuvos banko (licenzijaNo. 11).

Legal

Cookies Policy

Privacy Policy

Terms & Conditions – Business, Privacy Policy

Navigation

Home

Our Blog

Business

Personal

Virtual Cards

Pricing

About

Support

Login

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