

# **Privacy Policy**

Version 1.4 — Updated October 2025 for GDPR and FCA Compliance



#### 1. Overview

Azure Payments Ltd ("Azure", "we", "us") respects your privacy and is committed to protecting your personal data.

This Privacy Policy ("Policy") explains how we collect, use, store, disclose, and protect your personal data when you use our services, website (<a href="www.azurepay.io">www.azurepay.io</a>), or platform (<a href="mailto:ib.azurepay.io">ib.azurepay.io</a>).

## This Policy applies to:

- Visitors to our websites and platform;
- Clients using our payment or e-money services; and
- Individuals whose data we process in the course of providing regulated financial services.

By using our services or visiting our websites, you consent to the practices described in this Policy.

#### 2. Who We Are

Azure Payments Ltd is a company registered in England and Wales (Company No. 12108869), authorised and regulated by the Financial Conduct Authority (FCA) as a Small Electronic Money Institution (FRN: 901055).

Registered Address: 192–196 Campden Hill Road, London, England, W8 7TH

Phone: +44 (0)20 4579 2618 Email: compliance@azurepay.io

#### 3. Data Protection Contact

For all privacy-related matters, please contact our Data Protection Contact (DPC) at: <a href="mailto:privacy@azurepay.io">privacy@azurepay.io</a>

This contact point ensures compliance with Article 37 of the UK GDPR.



#### 4. Information We Collect

We collect personal data in the following ways:

# a) Information You Provide

When applying for our services, filling out forms, or contacting us:

- Name, date of birth, and contact details
- Address and nationality
- Passport/ID details (including photo)
- Email address and phone number
- Business details, including shareholders, UBOs, and representatives
- Financial and payment data (e.g. bank account or card information)

You confirm that all personal data shared is accurate and lawfully provided.

# b) Information We Collect Automatically

When you visit our website or platform, we may collect:

- IP address and device identifiers
- Browser type and settings
- Time zone, operating system, and platform
- Pages visited and actions performed
- Login and session information

## 5. Cookies

Our website currently does not use cookies.

If this changes, we will update this Policy accordingly and provide you with the option to manage cookie preferences.

# a) How We Use Personal Data

We use your data for the following lawful purposes:

Purpose	Legal Basis
Evaluating your application	Contract performance / legal obligation
Providing and maintaining services	Contract performance



Fraud prevention and AML checks	Legal obligation
Verifying identity and compliance screening	Legal obligation
Responding to inquiries and customer support	Legitimate interest
Informing you of product changes and updates	Legitimate interest
Marketing similar services (opt-out anytime)	Legitimate interest
Security and operational improvement	Legitimate interest

#### 6. Disclosure of Personal Data

We may share data with:

- Members of our corporate group
- Banking and payment infrastructure partners
- Card issuers, acquirers, and processors
- Regulatory and law enforcement authorities
- Service providers (e.g., cloud hosting, compliance tools)

We will only share personal data when necessary and in accordance with UK GDPR.

#### 7. International Data Transfers

Your data may be processed outside the UK, including in the EEA or the United States.

Where transfers occur, Azure ensures appropriate safeguards are in place, such as:

- Adequacy decisions (for EEA transfers); or
- Standard Contractual Clauses (SCCs) approved by the UK ICO.

Azure maintains a Third Country Transfer Register, available upon request.

## 8. Data Retention

We retain personal data:

- For as long as you use our services; and
- After account closure, for as long as required to comply with FCA, HMRC, and AML regulations (typically 5–10 years).



Data is securely deleted or anonymised once retention periods expire.

# 9. Security of Personal Data

We apply technical and organisational measures, including:

- Firewalls, encryption, and secure hosting
- Role-based access controls
- Regular vulnerability assessments
- Data minimisation and pseudonymisation where appropriate

While we take all reasonable steps to secure your information, transmission via the internet carries inherent risk.

# 10. Your Data Protection Rights

You have the right to:

- Access your personal data;
- Request correction or deletion;
- Object to processing or withdraw consent;
- Request data portability;
- Restrict processing in certain circumstances;
- File a complaint with the Information Commissioner's Office (ICO).

ICO Contact: www.ico.org.uk/concerns

## 11. Complaints

If you are not satisfied with our response to a privacy request or complaint, you can escalate to the Information Commissioner's Office (ICO) at:

https://ico.org.uk/concerns

## 12. Data Protection Impact Assessments (DPIAs)

Azure maintains Data Protection Impact Assessments for key processes, including onboarding, payments, and fraud prevention.

This ensures compliance with Articles 35–36 UK GDPR and FCA Operational Resilience expectations.



# 13. Accessibility and Transparency

# This Policy:

- Is structured using accessible headings and clear language;
- Is available in a downloadable, plain-text PDF format;
- Uses semantic tags and anchor links for online navigation.

## 14. Legal Definitions

# For clarity:

- "Personal Data" means information relating to an identified or identifiable person.
- "Processing" means any operation performed on personal data (collection, use, storage, etc.).
- "Controller" means the entity that determines the purposes and means of processing personal data.

## 15. Updates to This Policy

We may update this Policy periodically. Any changes will be posted on this page with an updated version number and date.

Version 1.4

#### 16. Contact Us

Azure Payments Ltd

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compliance@azurepay.io