

PRIVACY POLICY

1. INTRODUCTION

This Privacy Policy governs your visit to the [website](#), as well as the services available on the above domain and its subdomains.

It explains how we collect, safeguard and disclose information that results from your use of our Service. We use your data to provide and improve our Service. By using our Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meaning as in our Terms and Conditions. Our Terms and Conditions ("Terms") govern all use of our Service and, together with the Privacy Policy constitute your agreement with us ("Agreement").

CBPAY global needs the contact information you provide to us to contact you about our products and services. You may unsubscribe from these communications at anytime.

You can cancel your subscription by sending an email to support@cbpay.global

DEFINITIONS

SERVICE: means all the services available on the website and the app operated by CBPAY Global.

PERSONAL DATA: means data about a living individual who can be identified from that data (or from those and other information either in our possession or likely to come into our possession).

DATA CONTROLLER: means a natural or legal person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be, processed. For the purpose of this Privacy Policy, we are a Data Controller of your data.

DATA PROCESSORS (OR SERVICE PROVIDERS): mean any natural or legal person who processes the data on behalf of the Data Controller. We may use the services of various Service Providers in order to process your data more effectively.

DATA SUBJECT: is you or any living individual who is the subject of Personal Data.

THE USER is the individual using our Service.

The User corresponds to the Data Subject, who is the subject of Personal Data.

3. INFORMATION COLLECTION AND USE

We may collect information directly from you when you provide it to us. We may also collect information indirectly through automated means, such as through cookies or other tracking technologies. This information may include details about your device, browsing actions, and usage patterns. We may use this information to improve our services, to

personalize your experience, and to understand how our services are used. We collect several different types of information for various purposes to provide and improve our Service to you.

We may create anonymous, aggregated, or de-identified data from your personal information and other individuals whose personal information we collect. We make personal information into anonymous, aggregated, or de-identified data by removing information that makes the data identifiable to you. We may use this anonymous, aggregated, or de-identified data to analyze and improve the Service.

4. TYPES AND USE OF DATA COLLECTED

- Personal Data. While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you (“Personal Data”).
- Personally identifiable information may include but is not limited to: email address, first name and last name, cookies, usage data, and technical data. We may use your Personal Data to contact you with newsletters, marketing or promotional materials, and other information that may be of interest to you. You may opt out of receiving any or all of these communications from us by sending an email to support@cbpay.global
- Profile data: contact information, ID, name, subscription data.
- Usage data: the pages of our service that you visit, the time and date of your visit, the time spent on those pages, and unique device identifiers.
- Technical data: We may also collect information that your browser sends whenever you visit our Service or when you access the Service by or through a mobile device. This Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, and other diagnostic data.
- Performance data: assessments, tests, results and other type of academic records from your performance in our learning courses.

Purpose/Activity	Type of data	Lawful basis for processing
To capture new leads and manage the sales process	a. Profile data b. Usage data	a. Consent b. Necessary for our legitimate interests to expand our business
To provide and maintain our Service and to allow you to participate in interactive features of our Service	a. Technical data b. Usage data c. Profile data	a. Consent

To provide customer support	a. Profile data b. Technical data c. Usage	a. Necessary for our legitimate interests for the functioning and improvement of our Service
To gather valuable information and monitor the usage of our Service for analysis and improvement purposes.	a. Technical data b. Usage c. Profile data	a. Necessary for our legitimate interests for the functioning and improvement of our Service b. Consent
To detect, prevent and address technical issues	a. Technical data b. Profile data	a. Necessary for our legitimate interests to maintain the security of our Service
To provide you with news, special offers, and general information	a. Profile data b. Usage data	a. Consent
To carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing and collection.	a. Profile data b. Usage data	a. Legal obligation b. Contract
To create anonymous, aggregated or de-identified data	a. Usage data	a. Necessary for our legitimate interests for the functioning and improvement of our Service
To notify you about changes to our Service	a. Profile data	a. Consent

5. COOKIES

We use cookies and similar tracking technologies to track the activity on our Service, and we hold certain information. Cookies are files with a small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Other tracking technologies are also used, such as beacons, tags, and scripts to collect and track information and to improve and analyze our Service. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. We offer a cookie management tool to manage your cookie preferences and control the use of cookies when you visit our website. This tool allows you to customize your cookie settings based on your preferences. By accessing the cookie settings or following the instructions provided in the cookie banner or pop-up, you can make choices regarding

the types of cookies you accept or reject. However, if you do not accept cookies, you may not be able to use some portions of our Service.

The following categories of cookies may be used:

Essential cookies: these cookies are necessary for the basic functioning of our website. They enable core features such as secure logins, session management, and accessibility preferences. Without these cookies, the website may not function properly.

Marketing cookies: marketing cookies are used to track and collect information about your browsing habits and interactions with our website. They help us deliver targeted advertisements and promotional content that are relevant to your interests. These cookies may be set by our advertising partners.

Personalization cookies: personalization cookies allow us to customize your experience on our website based on your preferences and past interactions. They remember your settings, such as language preferences, and provide personalized recommendations or content suggestions.

Analytics cookies: analytics cookies help us gather information about how visitors use our website, such as the number of visitors, pages visited, and the source of traffic. This data is anonymous and helps us analyze and improve the performance and usability of our website.

6.STORAGE AND TRANSFER OF DATA

We store the personal information you provide us on secure servers, which are protected by industry-standard security measures. Your data may also be stored on secure third-party servers or cloud-based systems which adhere to our data security standards.

Your information, including Personal Data, may be transferred to – and maintained on – computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction. If you are located outside the United Europe and choose to provide information to us, please note that we transfer the data, including Personal Data, to the UE and process it there. Your consent to this Privacy Policy, followed by your submission of such information, represents your agreement to that transfer. COINBAR S.r.l, will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy, and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

7. THIRD PARTIES

While we do not engage in the sale of personal data, there are instances where we may disclose or share your information with carefully selected third parties. We may disclose personal information that we collect or you provide in the following way:

Disclosure for Law Enforcement. Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities.

Business Transaction. If we or our subsidiaries are involved in a merger, acquisition, or asset sale, your Personal Data may be transferred.

Other cases. We may disclose your information also: to our subsidiaries and affiliates; to fulfill the purpose for which you provide it; for the purpose of including your company's logo on our website,

Service Providers. We may employ third-party companies and individuals to facilitate our Service ("Service Providers"), provide Service on our behalf, perform Service-related services, or assist us in analyzing how our Service is used. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Upon request, we will provide a list of the third-party service providers we engage with.

8. RETENTION OF DATA

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or improve the functionality of our Service, or we are legally obligated to retain this data for longer periods.

9. SECURITY OF DATA

We take the security and safe storage of your personal information seriously. We implement reasonable and appropriate physical, administrative, and technical measures to protect your data from unauthorized access, theft, loss, or misuse. We store your data in secure servers with limited access, and we encrypt sensitive information during transmission. We also regularly review our security practices to ensure we are up-to-date with the latest security standards. However, please note that no transmission or data storage method over the Internet is 100% secure. Therefore, we cannot guarantee the absolute security of your data, but we will make every effort to protect it to the best of our abilities.

Your Data Protection Rights Under (GDPR)

We are a Data Controller in relation to the information that you provide to us, and we are legally responsible for how that information is handled. We will comply with the GDPR in the way we use and share your personal data.

Under certain circumstances, you have rights under data protection laws in relation to your personal data.

These include the right to:

- Request access to your personal data.
- Request correction of your personal data.
- Request the erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.

Right to withdraw consent.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

We aim to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We fully comply with Data Protection legislation and will assist in any investigation or request made by the appropriate authorities.

If you remain dissatisfied, then you have the right to apply directly to your local data protection authority. You can find the list at:

https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm

10. OUR OBLIGATIONS

As a company, we are dedicated to safeguarding the personal data of our customers and employees. In accordance with this commitment, we comply with the principles of the GDPR when collecting, utilizing, and handling personal data. This includes adherence to principles of legality, fairness, and transparency; limiting data collection to specific purposes; minimizing the amount of data collected; ensuring accuracy; limiting data storage; maintaining integrity and confidentiality; and being accountable for data protection.

11. LINKS TO OTHER SITES

Our Service may contain links to other sites that are not operated by us. If you click a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

12. CHILDREN'S PRIVACY

Our Services are not intended for use by children under the age of 18 ("Child" or "Children"). We do not knowingly collect personally identifiable information from Children under 18. If you become aware that a Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we take steps to remove that information from our servers.

13. CBPAY GLOBAL ROLE AS A PROCESSOR

Given the nature of our business, we act as a data processor when processing personal data under the direction of our customers, who act as data controllers. Our customers are responsible for complying with all relevant regulations and laws, including providing notice, disclosure, and obtaining consent before sharing personal data to use our services.

14. CHANGES TO THIS PRIVACY POLICY

We may update our Privacy policy from time to time. The "Last Revision" legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised.

Any changes will become effective when we post the revised Privacy Policy on the Services. Your use of the Services following these changes means that you accept the revised Privacy Policy.

15. CONTACT US

If you have any inquiries regarding this Privacy Policy, please feel free to contact us via email at support@cbpay.global

CBPAY Global

Effective date: 07/04/2025

