

## Privacy policy

This privacy policy applies to the website [www.elvn.com](http://www.elvn.com) as well as the messenger app "ELVN" (hereafter ELVN app) from PayExpert OÜ, Harju maakond, Tallinn, Lasnamäe linnaosa, Peterburi tee 47, 11415, Estonia (here after PayExpert). Data protection is one of PayExpert's top priorities. As citizens of the European Union are also able to visit the website and use the ELVN app, the following terms apply. Below the user will find information about which data are recorded during registration or during usage of the ELVN app, as well as when visiting the website, and how these data are used, processed, and forwarded.

The responsible party for data processing is:

PayExpert OÜ  
Harju maakond, Tallinn  
Lasnamäe linnaosa  
Peterburi tee 47  
11415  
Estonia

E-mail: [support@platin-genesis.com](mailto:support@platin-genesis.com)

The data protection officer for the responsible party is:

SBS Data Protect GmbH  
Hans-Henny-Jahnn-Weg 49  
22085 Hamburg

E-mail: [info@sbs-data.de](mailto:info@sbs-data.de)

The user refers to the aforementioned data protection officer for the assertion of the rights specified in this privacy policy or for questions pertaining to the usage, retrieval, or processing of personal data.

PayExpert, as the responsible party as per the data protection regulations, is obligated to protect its users' personal data and to treat them with confidentiality. The retrieval, storage, alteration, transmission, blockage, deletion and usage of personal data occur on the basis of the valid legal terms, in particular the General Data Protection Regulation (GDPR).

The users' data at PayExpert are protected by technical and organisational security precautions against access by unauthorised individuals, random or deliberate manipulation, destruction, or loss.

### I. Data processing for usage of the website

#### (1) Access data and cookies

For purely informational usage of our website, i.e. if you do not register or otherwise provide data to us, we only retrieve the personal data that your browser transmits to our server. If you would like to view our website, we retrieve the following data that we technically require in order to show you our website and to ensure stability and security:

IP address

Date and time of the request

Time zone difference based on Greenwich Mean Time (GMT)

Content of the prompt (specific page)

Access status/HTTP status code

Quantity of data transmitted

Website from which the prompt is coming

Browser

Operating system and its interface

Language and version of the browser software

However, our web server stores these data separately from other data, and it is impossible for us to allocate these data to a specific person. After an anonymous evaluation for statistical purposes, these data are immediately deleted. This evaluation is in PayExpert justified interest of optimising our presence. The legal basis for this is Art. 6 para. 1 s. 1 lit. f) GDPR.

In addition to the data previously mentioned, cookies are stored on your browser through usage of our website. Cookies are small text tiles that are allocated by your browser and stored on your hard drive, and through which the site that sets the cookie receives certain information. Cookies cannot operate programmes or transmit viruses to your computer. They serve to make the internet presence more user-friendly and effective overall.

PayExpert's website uses the following types of cookies, the scope and functionality of which are explained below:

a) Transient cookies are automatically deleted when you close the browser. These include session cookies. These store a so-called session ID, with which different requests from your browser can be allocated to the same session. This means that your computer can be recognised when you return to our website. The session cookies are deleted when you log out or close the browser.

b) Persistent cookies are automatically deleted after a specified period that may vary from one cookie to the next. You can always delete the cookies in your browser's security settings.

c) Third-party cookies are not set on a user's computer by PayExpert, but rather by third-party providers, and can be selected from the user's computer upon returning to the website. Contrary to cookies that are used by PayExpert, these are service providers who mostly collect user information that is relevant to marketing purposes.

d) Flash cookies are not recorded by your browser, but rather by your flash plug-in. These store the required information regardless of your browser, and have no automatic expiration date.

You may configure your browser settings as you wish, e.g. to prevent the acceptance of third-party cookies or all cookies. If you do not wish for any processing of flash cookies, you must install a corresponding add-on, e.g. "Better Privacy" for Mozilla Firefox (<https://addons.mozilla.org/en/firefox/addon/betterprivacy/>) or the "Adobe Flash Killer Cookie" for Google Chrome. The usage of HTML5 storage objects can be prevented if you set your browser to private mode. We also recommend regularly, manually deleting your cookies and browser history.

Please remember that by deactivating cookies, you may not be able to use all functions of this website.

The usage of cookies is in PayExpert interest of optimising our presence. The legal basis for this is Art. 6 para. 1 s. 1 lit. f) GDPR.

#### (2) Retrieval and usage of personal data during a contact request

Only the personal data that have been provided by users are retrieved and processed during a request through our contact form. The data provided by users for a contact request are solely retrieved, processed and used to process their requests.

This also includes forwarding to the internet service provider assigned to make our internet presence available. In doing so PayExpert adheres to the principle of data economy. It only shares the data that are absolutely required for the specific process. The data are also used to be able to communicate with the users. PayExpert does not provide the users' personal data to third parties without first obtaining the users' explicit consent, which may always be revoked by the user.

PayExpert stores this information until the consent has been revoked.

This data processing is based on Art. 6 para. 1 s. 1 lit. a) GDPR in conjunction with the user's consent.

#### (3) Retrieval of personal data upon formation of a contract

Personal data are only retrieved if you willingly provide them for purposes of an order or registration process. The following personal data are stored during registration:

1. Name,
2. Address,
3. Telephone number,
4. E-mail address.

PayExpert solely uses these data to execute the contract and to communicate with you as necessary. The data are stored until the contract has been executed completely. If commercial and tax law retention periods are in place, the storage period may be up to 10 years.

This data processing is based on Art. 6 para. 1 s. 1 lit. b) GDPR for execution of the contract.

#### (4) Usage of the data for advertising purposes, newsletter

PayExpert only uses personal user data to send a newsletter to the user if the user has consented to this usage beforehand.

For sending out the newsletter PayExpert uses the e-mail addresses and names of the users. For registration for our newsletter we use the so-called double opt-in procedure. This means that after you have registered we send an e-mail to the e-mail address you have provided, in which we ask you to confirm that you wish for us to send you the newsletter. If you do not confirm your registration within 24 hours, your information will be blocked and deleted automatically after one month. Furthermore, we store your IP address and times of registration and confirmation. The purpose of this process is to verify your registration and to be able to resolve any potential misuse of your personal data. You may always unsubscribe from the newsletter by clicking "Unsubscribe" at the end of the newsletter. After your consent has been revoked, the data you have shared when registering for the newsletter will be deleted immediately.

PayExpert evaluates the user's behaviour when it sends out the newsletter. For this evaluation the e-mails contain so-called web beacons or tracking pixels, which are one-pixel image files that are stored on the website. For these evaluations the data provided by the user and the web beacons are linked with the user's e-mail address and an individual ID. The data are always pseudonymised during retrieval, and the IDs are not linked with the user's other personal data, ruling out a direct personal correlation. The user can always decline this tracking by clicking on the separate link provided in each e-mail or by informing PayExpert through another means of contact. The information is stored for as long as the user is subscribed to the newsletter. After unsubscribing, PayExpert stores the data anonymously and solely for statistical purposes.

This data processing is based on Art. 6 para. 1 s. 1 lit. a) GDPR due to the user's consent, and on Art. 6 para. 1 s. 1 lit. f) GDPR for optimising our presence.

#### (5) Usage of Google Analytics

This website uses Google Analytics, a web analysis service from Google LLC (Google). Google Analytics uses so-called cookies, text files that are stored on the user's computer and which allow for evaluation of the user's usage of the website. The information created by the cookie about the usage of this website is usually sent to a Google server in the USA and stored there. In the event of activation of IP anonymisation on this website, the user IP address is truncated by Google beforehand within member states of the European Union or other signatory states of the Agreement on the European Economic Area. Only in exceptional cases is the full IP address sent to a Google server in the USA and truncated there. At the commission of PayExpert Google will use this information to evaluate usage of the website, compile reports about website activities, and render other services for PayExpert related to website and internet usage.

The IP address transmitted from the user's browser for purposes of Google Analytics is not consolidated with other data by Google.

The user can prevent the storage of cookies through a corresponding setting in their browser software; however, PayExpert would like you to remember the in this case the user may not be able to completely use all functions of this website. Furthermore, the user may prevent the recording of the data by the cookie based on their usage of the website (including IP address) for Google as well as the processing of these data by Google by downloading and installing the browser plug-in available at the following link: <http://tools.google.com/dlpage/gaoptout>.

Please remember that if you delete the cookies in your browser settings, this may result in the deletion of the opt-out cookie and you may have to reactivate it.

The PayExpert website uses Google Analytics with the extension "\_anonymizeIp()". This means that IP addresses are truncated before being processed further, ruling out personal allocation. If the data retrieved results in allocation to the user, this is immediately ruled out and the personal data are instantly deleted.

PayExpert uses Google Analytics to analyse usage of its website and to regularly improve it. With the statistics acquired in this manner PayExpert can improve its presence and make it more interesting for the user. In exceptional cases in which personal data are sent to the USA, Google has subjected itself to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.

Third-party provider information: Google Dublin, Google Ireland Ltd., Gordon House, Barrow Street, Dublin 4, Ireland, Fax: +353 (1) 436 1001.

Terms of use: <http://www.google.com/analytics/terms/us.html>, overview of data protection: <http://www.google.com/intl/de/analytics/learn/privacy.html>, and the privacy policy: <https://policies.google.com/privacy?hl=en>.

The usage of Google Analytics is based on Art. 6 para. 1 p. 1 lit. f) GDPR for ensuring the justified interests of PayExpert, namely optimisation of the web presence.

#### (6) Usage of social media plug-ins

PayExpert currently uses the following social media plug-ins: Pinterest, Facebook, Twitter, VK, Tumblr, YouTube.

The so-called two-click solution is used for this. This means that when the user visits the PayExpert page, at first no personal data are sent to the provider of the plug-ins. The provider of the plug-in can be recognised by the marking on the box above the first letter or logo. PayExpert makes it possible for the user to communicate with the provider of the plug-in directly through the button. Only when the user clicks on the marked field and activates it does the plug-in provider receive the information that the user has visited the respective PayExpert page. Furthermore, the data specified in the "Access data" section of this privacy policy are also transmitted. In Facebook's case, according to the provider the IP address is anonymised in Germany immediately after retrieval. By activating the plug-in, personal data of the user are sent to the respective plug-in provider and stored there (in the USA if the providers are American). As the plug-in provider retrieves the data primarily through cookies, PayExpert recommends that its users delete all cookies through their browser security settings before clicking on the greyed-out box.

PayExpert has no influence on the retrieved data or data processing procedures, nor is it aware of the full extent of the data retrieval, processing purposes, or storage periods. It is also unaware of how to delete the retrieved data through the plug-in provider.

The plug-in provider stores the data about the user as a usage profile, and utilises this for marketing, market research, and/or as-needed configuration of their website. Such an evaluation is also used (also for users who are not logged in) to display as-needed advertisements and to inform other users of the social network of the user's activity on the PayExpert website. The user has a right to object to the formation of this user profile, and to do so they must contact the respective plug-in provider. Through the plug-ins PayExpert gives the users the opportunity to interact with the social networks and other users in such a way that PayExpert can improve its presence and become more attractive for users.

The forwarding of data occurs regardless of whether the user has an account with the plug-in provider and is logged in there or not. If the user is logged into their respective account there, their data that we have retrieved are allocated directly to their account with the plug-in provider. If the user has clicked on the activated button and, for example, links the page, the plug-in provider also saves this information in the user's account and publicly shares it with the user's contacts. PayExpert recommends that users regularly log out after using a social network, especially before clicking the button, so that they can prevent such an allocation to their account with the plug-in provider.

Additional information about the purpose and scope of data retrieval and the processing thereof by the plug-in provider can be found in the providers' respective privacy policies, listed below. There the user will also find more information about their rights in this regard and possible settings for protecting their privacy.

The plug-in providers' addresses and URL with their privacy policies:

- a. Facebook Inc., 1601 S California Ave, Palo Alto, California 94304, USA; <http://www.facebook.com/policy.php>; additional information on data retrieval: <http://www.facebook.com/help/186325668085084>, <http://www.facebook.com/about/privacy/your-info-on-other#applications> and <http://www.facebook.com/about/privacy/your-info#everyoneinfo>. Facebook has subjected itself to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.
- b. Twitter, Inc., 1355 Market St, Suite 900, San Francisco, California 94103, USA; <https://twitter.com/privacy>. Twitter has subjected itself to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.
- c. Tumblr, Inc., 35 East 21st St, 10th Floor, New York, NY 10010, USA; <http://www.tumblr.com/privacy>. Tumblr has subjected itself to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.
- d. LLC V Kontakte, 1-N, bld. 12-14, Lit. A, Khersonskaya St., St. Petersburg, Russia; <https://vk.com/privacy>. VK has voluntarily subjected itself to the European General Data Protection Regulation GDPR, <https://www.eugdpr.org/>.
- e. Pinterest Inc., 651 Brannan Street, San Francisco, CA 94103, USA; <https://policy.pinterest.com/en/privacy-policy>. Pinterest has subjected itself to the EU-US Privacy Shield, <https://www.privacyshield.gov/EU-US-Framework>.
- f. YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA, additional information on data retrieval: [policies.google.com/privacy](https://policies.google.com/privacy). YouTube has subjected itself to the EU-US Privacy Shield, [www.privacyshield.gov/EU-US-Framework](https://www.privacyshield.gov/EU-US-Framework).

This data processing is based on Art. 6 para. 1 s. 1 lit. a) GDPR due to the user's consent and based on Art. 6 para. 1 s. 1 lit. f) GDPR for ensuring the justified interests of PayExpert, namely the optimisation of its presence.

#### (7) Facebook fan page

For the information service offered, PayExpert uses the technical platform and services of Facebook Ireland Ltd., 4 Grand Canal Square Grand Canal Harbour, Dublin 2, Ireland (hereafter: Facebook).

The ECJ believes that there is a shared responsibility as per Art. 26 GDPR between Facebook and the operator of a Facebook fan page for the personal data processed through the Facebook fan page. For this reason, Facebook and PayExpert have settled an agreement on this shared responsibility, which you may view here: [https://www.facebook.com/legal/terms/page\\_controller\\_addendum](https://www.facebook.com/legal/terms/page_controller_addendum)

PayExpert provides you with the following information on data processing on the Facebook fan page:

##### a) Responsible individuals

The processing of your personal data on the Facebook fan page PayExpert occurs in joint responsibility with Facebook Ireland Ltd., 4 Grand Canal Square Grand Canal Harbour, Dublin 2, Ireland.

##### b) Data processing

When accessing a Facebook fan page, the IP address of your end device is transmitted to Facebook. According to Facebook, this IP address is anonymized and deleted after 90 days, especially if it is a German IP address. Furthermore, Facebook stores additional information about the end devices of its users, e.g. the internet browser being used. Facebook may thus be able to allocate IP

addresses to individual users. If you are logged into your Facebook account while you visit our fan page, a cookie with your Facebook name will be placed in your end device. Because of this cookie Facebook can learn that you have visited our fan page and used it. Facebook uses this information to present you with customised content or advertisements.

If you do not wish for this, you should log out of your Facebook account or deactivate the "stay logged in" setting. We also recommend that you delete the cookies on your device and restart your browser. This process deletes Facebook information which Facebook can link to your account.

However, if you wish to use all of the functions of our fan page, you must first log in to your Facebook account. This will make it possible for Facebook to link to your account again.

Facebook has not definitively and clearly specified, and we are not aware of the manner in which Facebook uses the data from visits to Facebook pages for its own purposes, the extent to which activities on the Facebook page are allocated to individual users, how long Facebook saves this information, and whether data from a visit to the Facebook page is forwarded to third parties. As the user of our fan page we can only refer you to Facebook's statements on data protection.

Your data retrieved in this manner are processed by Facebook and may be sent to countries outside of the European Union.

Facebook provides a general description of which information Facebook receives and how it is used in Facebook's data usage regulations. There you can also find information about ways to contact Facebook as well as the possible settings for advertisements. The data usage regulations can be found at the following link: <https://www.facebook.com/about/privacy>.

Facebook's full data guidelines can be found here: [https://www.facebook.com/full\\_data\\_use\\_policy](https://www.facebook.com/full_data_use_policy)

Facebook's privacy policy contains more information on data processing:

<https://www.facebook.com/about/privacy/>

Objection possibilities (opt-out) can be used here: <https://www.facebook.com/settings?tab=ads> and here <http://www.youonlinechoices.com>

Facebook Inc., the American parent company of Facebook Ireland Ltd., is certified under the EU-US Privacy Shield and is thus obligated to adhere to the standards of European data protection law. Additional information on Facebook's Privacy Shield status can be found here: <https://www.privacyshield.gov/participant?id=a2zt0000000GnywAAC&status=Active>.

As the operator of the Facebook fan page, we are unable to assess the transmission and further processing of personal user data in third countries, e.g. the USA, as well as the associated risks for you as a user.

#### c) Insights function

Furthermore, as part of the so-called "Insights" function, Facebook provides fan page operator PayExpert with a range of statistical data. Facebook creates and provides these statistics. We as the operator of the fan page have no influence over the creation thereof, and in particular we are unable to prevent this function. Through Insights the following information about the categories "fans", "subscribers", "persons reached", and "interacting persons" is presented for us, with a specifiable period of time for each:

Page activities like visits, preview, actions on the page, reach activities such as "Like" input, people reached and recommendations, post activities like post interactions, video views, comments, shared content.

Furthermore, we are provided with statistical information about the Facebook groups with which our fan page is linked. According to the Facebook terms of use to which every user agrees when creating a Facebook profile, we can also identify the followers and fans of the page and view their profiles as well as other content they share.

Facebook provides more information about this at the following link:

<https://www.facebook.com/help/pages/insights>.

PayExpert uses these aggregated data in order to make posts and activities on the fan page more attractive for the users, e.g. planning the content and timing of posts. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. f) GDPR, namely our justified interest in the optimisation of our presence.

#### d) Saving period

We store the information conveyed by Facebook for as long as your interest in deletion or anonymisation does not outweigh our interest.

If you no longer wish for the data processing described here in the future, then please remove the connection between your user profile and our fan page by using the functions "Unlike this page" and/or "Unfollow this page".

#### e) Your rights as the affected person

We recommend that you direct disclosure requests or other questions concerning your rights, which are listed at the end of this privacy policy, to Facebook as only Facebook has full access to the user data. However, should you direct your question to us, we will of course process it and it will also be forwarded to Facebook.

## **II. Data processing when using the ELVN app**

In order to optimally protect your transmitted data, PayExpert uses SSL encryption and TLS encryption for the ELVN app. All data that you impart to the PayExpert server when using the app, such as during requests or log-ins, cannot be read by third parties due to these encryptions.

### (1) Data provided by the user

If the user installs and/or uses the ELVN app, the following data that the user provides to PayExpert are processed:

- a) Account information: In order to create an ELVN app account, the user must provide the following information: mobile phone number, username (pseudonym); e-mail address and profile picture are optional.

In accordance with the pertinent laws, the user also provides the telephone numbers that are saved in their phone's contacts list. Access to the contacts by the ELVN app can be prevented with a corresponding setting in the user's mobile phone.

This data processing aims to fulfil the contract through usage of the ELVN app as per Art. 6 para. 1 s. 1 lit. b) GDPR, as well as on the basis of the voluntary consent of the user as per Art. 6 para. 1 s. 1 lit. a) GDPR.

- b) Sending messages: The messages sent by the user in the ELVN app are not stored for purposes of provision of the messenger service. Once the messages (including attached photos, videos, voice messages, files and "share location" information) have been sent, they are deleted by the servers. The messages are saved on the users' end devices. If a message could not be sent immediately (e.g. because the user is offline), PayExpert can store the message in its servers for up to 30 days while attempts are made to send the message. If a message has not been sent after 30 days, it is deleted by the servers.

This data processing aims to execute the contract. The legal basis of Art. 6 para. 1 s. 1 lit. b) GDPR.

- c) Creating chat groups: For purposes of convenient communication, the ELVN app makes it possible to create groups of contacts within the messaging app. The user can create groups, join them, or be added to them. Groups are linked with the users' account information for this purpose. The user can choose whether they will upload a group profile picture or a group description.

This data processing aims to execute the contract, and is based on the user's consent. The legal basis is Art. 6 para. 1 s. 1 lit. b) and lit. a) GDPR.

- d) Usage of the integrated social network: For usage of the functions of the social network, PayExpert records information on the people, pages, accounts, hashtags and groups with which the user is connected.

Furthermore, PayExpert records how the user interacts with other people on the social network; this includes people with whom the user communicates with the most as well as groups in which the user is a member. PayExpert also collects contact information when the user uploads, synchronises or imports this from a device. PayExpert uses this contact information to help the user find people whom the user may know.

PayExpert also processes information about how the user uses the social network, such as through the type of content that the user views or interacts with; through the functions used by the user; through the actions performed by the user; through the people or accounts the user interacts with; through the frequency and duration of their activities (time and type of the last session); through the usage of the camera function.

The user can share content (photos, videos, links, comments, like-button) with a certain, selected target group. The selected individuals can see the content that has been shared by the user.

People with whom the user is connected in the social network can see if the user is active or when they were last active.

This data processing aims to execute the contract, and is based on the user's consent. The legal basis is Art. 6 para. 1 s. 1 lit. b) and lit. a) GDPR.

- e) Usage of the integrated crypto-wallet: With the crypto-wallet integrated into the ELVN app, the user is able to receive and/or send Platincoins (PLC) to other users (transaction). For a transaction PayExpert processes the following data: username of the sender/recipient; amount of the sent/received Platincoins; time and date of the transaction. Furthermore, these data are displayed to the respective transaction partner during a transaction.

Each successful transaction is viewable via the blockchain and is cryptographically secured; in particular it is impossible for third parties to tell which user performed which transaction. This technical implementation means that it is nearly impossible to determine the real identity of the sender/recipient of Platincoins within a transaction.

This data processing is based on Art. 6 para. 1 s. 1 lit. b) GDPR for executing the contract, and based on your granted consent as per Art. 6 para. 1 s. 1 lit. a) GDPR.

- f) Customer support: When the user sends requests to the ELVN APP customer support, only those data which the user has voluntarily provided are processed.

This data processing is based on the user's consent. The legal basis for this is Art. 6 para. 1 s. 1 lit. a) GDPR.

## (2) Automatically recorded data

When the user installs and/or uses the ELVN app, the following data are processed and automatically recorded:

- a) Usage and log information: PayExpert records information on the user's activity in the ELVN app. This information includes:

The time, frequency and duration of the user activities and interactions with other users; log files and diagnosis, crash, website and performance logs and reports; time of registration by the user; usage of app functions (messages, calls, status or group functions); current status of the user (online or offline); time of last usage of the service; time of last update of the profile information.

This data processing aims to execute the contract and to ensure the justified interests of PayExpert. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. b) and lit. f) GDPR.

- b) Device and connection data: When the user installs, uses or accesses the ELVN app, the ELVN app records device- and connection-specific information. This includes:

Information on the hardware model and operating system, battery level, signal strength, app version; information on the browser and mobile network as well as the connection, including telephone number, mobile network or internet provider, language, time zone and IP address; information on device operation and identifiers such as device identifiers.

This data processing aims to execute the contract and to ensure the justified interests of PayExpert. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. b) and lit. f) GDPR.

- c) Location information: The ELVN app records the device's location information when the user uses the location functions, e.g. shares their location with their contacts, places nearby, or views locations that other users have sent them. For diagnostic purposes and to resolve problems and errors, PayExpert also processes location information when the user has problems with the app's location functions.

This data processing is based on the granted consent and aims to execute the contract. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. a) and lit. f) GDPR.

- d) Cookies: The ELVN app uses cookies to operate and provide its services, especially for the provision of its web-based services, to improve the user experience, to analyse usage, and for purposes of individual adjustment of the services. Cookies are small text files (see section I. of this privacy policy) that contain a sequence of characters and which can be placed on the user's computer or mobile device and which clearly identify the user's browser or device. The following cookies are used: session cookies, persistent cookies, third-party cookies. By following the instructions of the ELVN app the user can deactivate the cookies. PayExpert notes that by changing these settings, the user may no longer be able to access certain parts of the app and that other parts of the app may no longer function properly.

This data processing aims to execute the contract and to ensure the justified interests of PayExpert, namely optimisation of its presence. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. b) and lit. f) GDPR.

### (3) Data of other users

When the user installs and/or uses the ELVN app, the following user data that are retrieved by third parties are processed:

PayExpert receives the following user data from other users if these data are provided through usage of the app: telephone number, name, other information in the respective user's contact list (e.g. e-mail address). PayExpert requests from its users that they have the rights to record, use and share this information about other users (see terms of use).

This data processing is based on the granted consent and aims to execute the contract. The legal basis for this data processing is Art. 6 para. 1 s. 1 lit. a) and lit. b) GDPR.

### (4) Storage period and deletion of the ELVN app/ELVN app account

PayExpert saves the user data it has retrieved for as long as the user uses the ELVN app or until the user has deleted their account, depending on whichever occurs first. The user can delete their ELVN app account at any time by using the in-app "Delete my account" function. When the user deletes their ELVN app account, their messages that have not been sent as well as all other data that PayExpert no longer needs to operate and provide their services are deleted by the servers. Should the user delete the ELVN app from their device without deleting their ELVN app account, the user's retrieved data will still be stored for as long as the user's interest in deletion does not outweigh the interests of PayExpert. These data will then also be deleted. Deletion of the ELVN app account has no influence on data that the user has sent to other users through the ELVN app before said deletion (e.g. sent messages).

## III. Rights of the user as the affected individual

(1) The users have the right to:

- Information about the processing of their data
- Correction or deletion of their data
- Restriction of processing
- Objection to processing

-Data transferability

-Revocation of their consent with effect for the future

-Complain to the data protection supervisory authority

A list of all supervisory authorities can be found here:

[https://www.bfdi.bund.de/DE/Infothek/Anschriften\\_Links/anschriften\\_links-node.html](https://www.bfdi.bund.de/DE/Infothek/Anschriften_Links/anschriften_links-node.html)

(2) This privacy policy can always be viewed and found at [www.elvn.com](http://www.elvn.com).

Version of this privacy policy: 05.11.2018