



Process owner CRO / MLRO	Type Policy	Subject GDPR Policy		
	Date 01 August 2022	Appendix no. 1	Revision 1	



Pagora

GDPR Policy



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GDPR, stands for “General Data Protection Regulation” and it establishes a new framework for handling and protecting the personal data of EU-based residents and is in effect since May 25, 2018. It provides the citizens of the EU greater control over their personal data and assures them that their information is protected.

Does GDPR affect you? Although GDPR is a data protection framework for the citizens residing in the EU, it also applies to all companies that handle personal data of individuals from the EU. If you or your organization stores and processes personal data in connection to services or goods offered in EU, then the laws applies to you as well.

In relation to the GDPR (General Data Protection Regulation) and other applicable legal acts, Pagora Ltd will process the data provided in the online applications and other sources in any manner in order to fulfil the agreements between customer and Pagora Ltd, for the following purposes:

- To provide, develop or improve our products and services, or otherwise for legitimate business reasons;
- For internal assessment and analysis (e.g.automated profiling, market and product analysis);
- If we are under a duty to disclose or share your data to comply with any legal or regulatory obligation; or to protect our rights, property, or safety of our employees, customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection. Please note that your personal data may, for the above purposes, also be disclosed to or shared with other entities in the Pagora group of companies, and other third parties entrusted with providing Pagora with due diligence, software development and maintenance, and payment processing services. Pagora may periodically request you to re-confirm the provided data and/or inform us immediately if any such data has changed.

GDPR includes a right for individuals to have inaccurate personal data rectified or completed if it is incomplete. End-users and agents in Pagora can rectify any errors in their personal data by editing their profiles.

At Pagora, we are committed towards providing a service which enables our customers reliable customer support, by implementing and adhering to prescribed compliance policies, both as a data controller and processor. The GDPR enforcement is critical to our mission of providing EU and all our global customers with safe and dependable customer service experience. For more information or questions about the Pagora Ltd Privacy Policy, please see Data Protection policy.

Disclaimer: This is for informational purposes only and should not be relied upon as legal advice or to determine how GDPR might apply to you and/or your organization. We encourage you to obtain



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independent professional advice, before taking or refraining from any action on the basis of the information provided here.

