

Privacy Statement

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This GalaxyEX Pay Privacy Statement ("Privacy Statement") describes how GalaxyEX Pay Limited ("GalaxyEX Pay," "we," or "us") handles your personal information. By "personal information," we mean any information that, alone or in combination with other data, can directly or indirectly identify you ("you," "your," or "customer"), such as your email address, contact information, or any unique identifier, such as an IP address, device ID, or other online identifier.

We provide GalaxyEX Pay technology to merchants, enabling you, as an end-customer, to transact with them using digital tokens.

Capitalized terms not defined in this Privacy Statement shall have the meanings ascribed to them in our end-customer customer service terms (available here).

Please read the following carefully to understand what personal information we collect, how we use it, and how we share it.

The data controller of your personal information is GalaxyEX Pay. GalaxyEX Pay primarily collects personal information from merchants; in fact, when you transfer digital tokens using GalaxyEX Pay, merchants share some of your personal information with us. We also collect limited personal information directly from you.

1. How We Handle Your Personal Information

Purpose	Personal information		Legal basis
	From you	From others and your devices	
To provide our services to merchants and enable them to conduct their business (i.e. to allow them to complete transactions and contact you with order updates)	Email address, contact details and other information for company verification	Email address, IP address, device ID, transaction ID number, payment information	You are using us (performance of contract)
Providing our	N/A	Transaction	

Services (i.e. allowing end customers to transfer Digital Tokens and purchase products on merchant websites)		ID Number	
To enforce or apply our agreements with merchants	N/A	Name, address, IP address, device ID, transaction ID number	We believe we can (legitimate interests)
Protect the rights, property, and safety of us, our customers, or others	N/A	Name, address, IP address, device ID, transaction ID number	
Comply with industry self-regulatory, audit and security requirements	N/A	Name, address, IP address, device ID, transaction ID number	
Provide you with news and other matters of general interest	N/A	Email address, IP address, other technical information obtained through cookies and other tracking	
			You agree (Agree)

		technologies	
To meet our legal and regulatory requirements, including verifying your identity to prevent money laundering and terrorist financing or to respond to your requests	Contact details, email address	Name, address, IP address, device ID, transaction ID number	Comply with legal requirements

When we say we believe we can process your data, it's because we believe we have a legitimate interest in doing so and it's in the interests of our organization to conduct and manage our business; this includes protecting our interests and enforcing our agreements with others, as well as complying with industry self-regulatory requirements. We ensure that we balance any potential impact on you and your rights before processing your personal information on this basis. You can obtain more information about how we assess our legitimate interests against any potential impact on you for a particular activity by contacting us. Please also see the "Your Rights" section below.

It is important that the personal information we collect from you is accurate and up-to-date. If your personal information changes during your relationship with us, please let us know. You can change your information by submitting a customer support ticket. We will endeavor to make these changes within a reasonable timeframe.

If you do not want your personal information used in the manner described in this Privacy Notice, you should not use this website or the services, functions, or features offered on this website from time to time ("Services"). If we need your information to provide our Services or to meet any of our legal or regulatory requirements, failure to provide such information will mean that you will not be able to access the Services.

Aggregated Data. We may also aggregate the personal data and other data we obtain so that it is no longer personally identifiable. Aggregated data may include usage patterns or information and data you provide to us. We reserve the right to use this aggregated information to improve and enhance our services, generate insights, market to other users and existing and potential partners, and for other purposes related to our business. To the extent such aggregated data does not directly or indirectly identify you personally, it is not considered Personal Information

and is not subject to this Privacy Statement.

2. Security and Confidentiality

We are committed to protecting your privacy. Internally, only personnel who have a business need to know or whose duties reasonably require access to personal information are authorized to access customer personal information. Such personnel will only process your personal information on our instructions and are subject to a duty of confidentiality. We regularly review our compliance with these requirements.

We regularly review our website systems and data to ensure you receive a high-quality service and that leading-edge security features are in place. We have procedures in place to deal with any actual or suspected data breach and will notify you and any applicable regulator of a data breach if required by law.

We take every reasonable effort to protect and safeguard personal information. Unfortunately, the transmission of information via the internet is not completely secure. While we do our best to protect your personal information, we cannot guarantee the security of data transmitted to us via email or through the Website; any transmission is at your own risk. Once we have received your personal information, we will use strict procedures and security features to prevent unauthorized access, but you should also take some protective measures. Do not share your personal information with others unless you clearly understand the purpose for which they are requesting your personal information and you know who you are dealing with. Do not store sensitive personal information in your email inbox or webmail. If you are asked to assign a password to connect you to your personal information, you should use a secure password and always use two-factor authentication (2FA) where available. You should change your password regularly.

3. With whom we share your personal information and what information we share

We disclose your information to the following parties:

3.1. Any member of our group, which means our direct or indirect subsidiaries, our ultimate holding company and any other subsidiaries of that holding company, including their respective shareholders, directors, officers, affiliates, employees, contractors, agents, partners, insurers, and attorneys or representatives. 3.2. Our service providers, to the extent necessary to provide you with our services (i.e., supporting transactions on the GalaxyEX Pay API or sending you newsletters (if you subscribe).

3.3. Authorities and law enforcement agencies worldwide, either upon order or on our own initiative, whenever we deem it reasonable and necessary (see our Law Enforcement Request Policy here).

3.4. Merchants with whom you conduct transactions. If you have any questions about how a merchant shares your personal information, you should contact the merchant and request a copy of their privacy statement.

3.5. We will provide information to authorities and law enforcement agencies worldwide,

either upon order or on our own initiative, whenever we deem it reasonable and necessary.

3.6. If we or substantially all of our assets are acquired by a third party, in which case personal information will be one of the transferred assets.

3.7. If we are under a duty to disclose or share your personal information to comply with any legal obligation, to enforce or apply our terms and conditions, or to protect the rights, property, or safety of us, our clients, customers, or others.

We also reserve the right to share your personal information collected using the GalaxyEX Pay API. The right to aggregated price information and other aggregated data and information about traded digital tokens.

4. Transfers

Your personal information will be stored in the European Economic Area ("EEA") and may be transferred worldwide.

As a result, personal information and other data may be exported outside your jurisdiction of residence. In such cases, governments, courts, law enforcement agencies, or regulators in that country or those countries may be able to obtain your personal information under foreign law. You should be aware that privacy standards in those countries may be lower than those in your jurisdiction of residence.

EEA Customers. We will take all steps reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Statement. All personal information we process about you is stored on our secure servers. When we transfer data outside the EEA, we ensure adequate safeguards are in place. This includes, where necessary, taking steps to assess the risks associated with transferring data to countries that do not provide an adequate level of protection. If you would like to learn more about our practices regarding the transfer of your personal information outside the EEA, please contact us. Please contact us for the specific mechanism used when processing your personal information.

5. Data Retention

We have established data retention and deletion policies that aim to retain personal information no longer than is necessary for the purposes outlined herein or to satisfy legal or business needs. Due to these retention requirements, we may be unable to comply with deletion requests.

6. Your Rights

All customers. You may access, verify, and request deletion of your personal information held by GalaxyEX Pay by submitting a written request to galaxyexusa@gmail.com.

EEA customers. You have several rights regarding how we process your personal information. You can exercise these rights by contacting us (details below). These rights include:

- 6.1. Access to personal information we hold about you;
- 6.2. Correction of any inaccurate personal information we hold about you;
- 6.3. Delete your personal information in certain circumstances, such as when it is no longer necessary for us to process your personal information for the purposes of our processing or you have exercised your right to object to processing;
- 6.4. Restrict the processing of your personal information, for example, if it is inaccurate, we no longer need to process it, or you have exercised your right to object to our processing;
- 6.5. Object to the processing of your personal information in certain circumstances, such as when your legitimate interests outweigh ours; and
- 6.6. Port your personal information to a new service provider.
- 6.7. Where we rely on your consent to process personal information (tracking technologies and newsletters), you have the right to withdraw your consent at any time. For newsletters, you can opt out at any time using the link provided in the newsletter or by sending a written request to galaxyexusa@gmail.com. We will do our best to promptly honor your request. For cookies, please visit our [Cookie Policy](#).

No fee is usually required.

You do not have to pay a fee to access your personal information or exercise any of your other rights. We may charge a reasonable fee if your request is manifestly unfounded, repetitive, or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal information (or to exercise any of your other rights). This is a security measure to ensure that personal information 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.

Time limits for responding.

We try to respond to all legitimate requests within one month. If your request is particularly complex or you have made multiple requests, we may need to contact you to request further information in relation to your request. Sometimes it may take us longer than a month to process your request. In this case, we will notify you and keep you updated.

7. Changes to This Privacy Statement

Any future changes we make to this Privacy Statement will be posted on this page and, if significant, notified to you by email. Please check back frequently for any updates or changes to our Privacy Statement.

8. Contact

Questions, comments, and requests regarding this Privacy Statement should be sent to

galaxyexusa@gmail.com.

EEA/UK Customers. If you have any questions about how we process your personal information, please first contact us by email at galaxyexusa@gmail.com. We will do our best to resolve your concerns. You may also file a complaint with the national supervisory authority in your jurisdiction; details are available online.