

**PAYALO LTD**  
**Privacy Policy**

Last Update and Effective Date: May 2026

PayAlo Ltd, a company incorporated under the laws of the Republic of Cyprus, with registered office at Troodos 20, IOANNOU TOWER, Agios Athanasios, 4105, Limassol, Cyprus ("**PayAlo**", "**we**", "**us**" or "**our**"), respects your privacy and is committed to protecting Personal Data processed through our Website, Platform, APIs, dashboards, notifications, support services and related services.

This Privacy Policy explains how PayAlo collects, uses, stores, shares, transfers and protects Personal Data when you access or use our services, including where you interact with us as a merchant, customer, authorized user, partner, service provider or Website visitor.

Personal data/information is defined as any information that identifies an individual or may reasonably identify an individual with reasonable effort, including without limitation: your name, surname, date of birth, residing address, IP address, email address or telephone number, ID documentation, financial documents as utility bill or bank statements as well as other non-public information about you that is associated with or linked to any foregoing, hereinafter referred to as the "**Personal Data**". Processing activities include, among others, the collection, use, retention and disclosure of such data.

In this Policy, you can learn about:

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2. **Scope of this Privacy Policy**
3. **Personal Data We May Collect**
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**1. General Information**

PayAlo provides a payment notification and Platform integration service ("**Platform**") that enables merchants and their authorised partners to receive, transmit, manage and monitor payment-related notifications, transaction status information and related technical data through the PayAlo Platform ("**Services**").

PayAlo may facilitate technical integrations between merchants and third-party payment channels, including banks, payment service providers, mobile money operators, aggregators, telecom providers and other relevant payment or notification partners.

For clarity, PayAlo does not (a) hold customer funds, (b) operate customer wallets, (c) issue electronic money, (d) provide bank accounts, or (e) act as a licensed payment institution, unless expressly agreed in writing and permitted under applicable law. You acknowledge and understand that payment processing, settlement and fund-holding functions are performed by the relevant third-party payment service providers, banks, mobile money operators, aggregators or other payment channels.

**2. Scope of this Privacy Policy**

This Privacy Policy applies to Personal Data processed in connection with:

- a. access to and use of the PayAlo website ("**Website**");
- b. use of the Platform;
- c. merchant onboarding and account administration;
- d. payment notification and transaction-status services;
- e. API integrations, logs and technical support;
- f. fraud prevention, security monitoring and compliance checks;
- g. communications with PayAlo; and
- h. any other services provided by PayAlo from time to time.

This Privacy Policy does not apply to the privacy practices of third-party payment providers, banks, mobile money operators, telecom providers, merchants or other third parties. Those parties may have their own privacy policies and data-processing practices. You are solely responsible for reading the privacy policies of any third-party payment provider.

**3. Personal Data We May Collect**

Depending on your relationship with PayAlo, we may collect and process the following categories of Personal Data:

**3.1 Merchant and Business Contact Data**

This may include:

- a. name;
- b. business email address;
- c. telephone number;
- d. job title or role;
- e. company name;
- f. business address;

- g. authorised user details;
- h. account administrator details; and
- i. information provided during merchant onboarding.

### **3.2 Payment Notification and Transaction-Related Data**

PayAlo may process payment-related technical data and notification data, including:

- a. transaction reference numbers;
- b. payment status information;
- c. merchant transaction IDs;
- d. timestamps;
- e. payment channel references;
- f. amount and currency information;
- g. customer identifiers provided by merchants or payment partners;
- h. mobile numbers or account identifiers where required for notification purposes;
- i. reconciliation references; and
- j. error messages or failed transaction notices.

PayAlo processes this data to transmit, receive, display, reconcile or manage payment-related notifications and transaction-status updates. PayAlo does not process this information in order to hold or settle funds on behalf of customers unless expressly agreed and legally permitted.

### **3.3 Technical and Usage Data**

When you use our Website, we collect technical information about your interaction with our Services, APIs or related services, including:

- a. IP address;
- b. browser type and version;
- c. device identifiers;
- d. operating system;
- e. log-in and log-out times;
- f. API request and response logs;
- g. error logs;
- h. usage history;
- i. security logs;
- j. location data derived from IP address; and
- k. other diagnostic or analytics data.

### **3.4 Communications and Support Data**

If you contact us, we may process:

- a. email correspondence;
- b. support tickets;
- c. complaint details;
- d. information submitted through contact forms; and
- e. any documents or information you voluntarily provide to us.

### **3.5 Compliance and Security Data**

Where required, we may process data for compliance, risk management and security purposes, including:

- a. identity verification data relating to merchants or authorised representatives;
- b. corporate documentation;

- c. sanctions or screening results;
- d. fraud-risk indicators;
- e. suspicious activity indicators;
- f. audit logs; and
- g. records required for legal, regulatory, tax, accounting or dispute-resolution purposes.

#### 4. How We Collect Personal Data

We may collect Personal Data:

- a. directly from you;
- b. from merchants using the Platform;
- c. from authorised users of merchant accounts;
- d. from third-party payment channels and integration partners;
- e. from service providers assisting us with hosting, security, support or analytics;
- f. automatically through our Website, Platform, APIs and technical systems; and
- g. from publicly available sources where relevant for compliance or business verification purposes.

#### 5. How We Use Personal Data

We may process Personal Data for the following purposes:

- a. to provide, operate and maintain the Platform;
- b. to create and manage merchant accounts;
- c. to authenticate users and manage access permissions;
- d. to transmit and receive payment-related notifications;
- e. to display and manage transaction-status information;
- f. to support reconciliation, reporting and audit processes;
- g. to provide technical support and customer service;
- h. to monitor Platform performance and availability;
- i. to detect, prevent and investigate fraud, misuse, security incidents or unauthorised access;
- j. to improve our services, APIs, Platform functionality and user experience;
- k. to communicate with merchants, users, partners and service providers;
- l. to comply with legal, regulatory, tax, accounting and contractual obligations;
- m. to respond to lawful requests from authorities, regulators or courts;
- n. to enforce our agreements, policies and legal rights; and
- o. to protect the rights, property, security and integrity of PayAlo, our merchants, users and partners.

#### 6. Legal Basis for Processing

Where the General Data Protection Regulation or other applicable data protection laws apply, we may rely on one or more of the following legal bases:

We will only process your Personal Data where we have a valid legal basis under Article 6 GDPR (or Article 9 where special category data is involved).

Purpose and Scope of Collected Data	Legal Basis
<p><b>Provision of our Services; support.</b></p> <p>We use your Personal Data, such as your name and email address, to provide our products and</p>	<p>The legal bases for processing this data are the performance of our contractual obligations (Article 6(1)(b)) – Our processing is necessary for the performance of a contract to which you are a party or</p>

Purpose and Scope of Collected Data	Legal Basis
<p>services, complete financial transactions and fulfill contractual obligations.</p>	<p>in order to take steps at your request prior to entering into a contract.</p>
<p><b>Payments.</b></p> <p>We collect certain information to receive, transmit, manage and monitor payment-related notifications, transaction status information.</p>	<p>The legal bases for processing this data are the performance of our contractual obligations (Art. 6.1(b) GDPR); and our legitimate interests (Art. 6.1(f) GDPR). Our legitimate interests in this case are billing for the Services provided by us and compliance with our contractual obligations.</p>
<p><b>Improve our Services.</b></p> <p>We collect and analyse information about you and your usage of our Services to improve the usability and effectiveness of our Services.</p>	<p>The legal basis for processing this data is our legitimate interest (Art. 6.1(f) GDPR). Our legitimate interests in this case are providing and improving our Services.</p>
<p><b>Marketing and Advertising.</b></p> <p>We use your Personal Data in order to provide you with personalized advertisements, including behavioural advertising when you visit our Services and to personalize your customer experience. In addition, we may use your Personal Data for certain marketing and promotional activities as well as gather aggregate usage information for analytics, statistical and research purposes.</p>	<p>The legal bases for processing this data are your consent (where required) (Art. 6.1(a) GDPR) and our legitimate interests (Art. 6.1(f) GDPR). Our legitimate interests in this case are providing you with tailored services, content and advertisements that better fit your interests and promoting our Services.</p>
<p><b>Integrity.</b></p> <p>We may process certain information about you and your usage of the Service in order to keep the integrity and security of the Services, prevent fraud, identify your identity and enforce our policies.</p>	<p>The legal bases for processing this data are compliance with our legal obligations (Art. 6.1(c) GDPR) and our legitimate interests (Art. 6.1(f) GDPR). Our legitimate interests in this case are keeping the integrity of our Services and the safety of our end-users.</p>
<p><b>Corporate transactions.</b></p> <p>We may share your Personal Data with potential purchasers, successors or investors in the Company or in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, reorganization, bankruptcy, consolidation or asset sale of an asset or transfer in the operation thereof) in relation to the Company.</p>	<p>The legal basis for processing this data is our legitimate interests (Art. 6.1(f) GDPR).</p>
<p><b>Prevention of fraud or violation of our policies.</b></p> <p>We may process your Personal Data to detect and prevent fraudulent and illegal activity or any other</p>	<p>The legal basis for processing this data is our legitimate interests (Art. 6.1(f) GDPR). Our legitimate interests in</p>

Purpose and Scope of Collected Data	Legal Basis
type of activity that may jeopardize or negatively affect the integrity of the Service, including by identifying risks associated with your activity on our Service. We may also investigate any violations of our policies and enforce them.	this case are to protect our Company and other users against fraud.
<p><b>Compliance with applicable laws.</b></p> <p>We process your Personal Data in order to comply with our legal obligation under applicable laws.</p>	Our legal bases for processing such data is compliance with our legal obligations (Art. 6.1(c) GDPR), we may be required to collect, retain, or share your Personal Data under applicable laws.

### 7. PayAlo’s Role as Controller or Processor

PayAlo acts as a data controller where it determines the purposes and means of processing Personal Data, including in relation to:

- a. Website visitors;
- b. merchant onboarding and account administration;
- c. direct communications with PayAlo;
- d. business contacts;
- e. compliance and security activities; and
- f. PayAlo’s own legal, audit and operational records.

In certain circumstances, where PayAlo processes customer or transaction-related Personal Data on behalf of a merchant solely for the purpose of providing Platform, notification, integration or technical services, PayAlo may act as a data processor or service provider, depending on the applicable agreement and data protection law.

Where required, PayAlo and the merchant may enter into a separate data processing agreement or data processing addendum.

### 8. Sharing Personal Data

- a. **Affiliated companies:** We may share Personal Data internally within our affiliated companies and subsidiaries, for the purposes described in this Policy.
- b. **Payment processors:** We share your payment information with third party payment processors (e.g. banks, aggregators, mobile money operators), for the purpose of facilitating your payments when using our Services. These third parties may have access to your Personal Data so that they may perform these tasks on our behalf.
- c. **Service and telecom providers:** Our service providers work on our behalf that may need access to certain Personal Data in order to provide their services to us. These companies include those we have hired to provide customer service support, hosting, billing, content management tools, analytics, customer service, fraud protection, etc..
- d. **Third party advertisers:** We may partner with third parties to either display advertising on our Services or to manage our advertising on other Websites or apps. Our third party advertisers may use Tracking Technologies to gather information about your activities on our Services and other Websites and apps in order to provide you advertising based upon your browsing activities and interests.

- e. Compliance with laws and law enforcement entities: We may disclose any data about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal procedures (including but not limited to subpoenas), to protect our or a third party's property and rights, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable. We may also be required to disclose an individual's Personal Data in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.
- f. Auditors and advisers: We may share your data with our external auditors, advisors and professional service providers (e.g., lawyers, accountants, insurers) for ensuring our compliance with regulatory requirements and industry standards.
- g. Mergers and acquisitions: We will transfer, sell or otherwise share your data in case of entering into a business transaction such as merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets.

All third-party recipients may only use Personal Data on our behalf or for specific permissible purposes, and are subject to strict confidentiality and data protection requirements as part of our contractual arrangements with them. Third parties may independently collect, process, verify, authorise, decline, settle or otherwise handle payment-related data.

All third-party recipients with access to Personal Data are required to enter into data processing agreements or other appropriate contractual arrangements that include confidentiality obligations and require the implementation of appropriate technical and organizational measures to protect Personal Data, in accordance with Article 28 GDPR.

You may request further information about the categories of third-party recipients of your Personal Data by contacting us using the details in the "Contact Us" section below.

**Merchants and users should review the privacy policies and terms of the relevant third-party providers.**

## **9. International Transfers**

Personal data may be processed in countries outside the country where you are located and/or outside the European Economic Area ("EEA"), including countries where PayAlo, its affiliates, merchants, partners, payment channels or service providers operate.

The data protection and other laws of these countries may not be as comprehensive as those in the EEA. In these circumstances, we will take reasonable steps to ensure that your Personal Data is protected in accordance with this Policy through appropriate safeguards for international transfers as permitted under Article 46 GDPR, which may include:

- a. European Commission adequacy decisions;
- b. Standard Contractual Clauses approved by the European Commission ("SCCs");
- c. Binding Corporate Rules where applicable within our corporate group;
- d. data processing agreements with contractual confidentiality and security obligations;
- e. other lawful transfer mechanisms.

For more information about the international transfer of your Personal Data, our contact details are available under the section below "Contact Us".

In addition to GDPR, PayAlo is committed to compliance with applicable data protection laws in the African territories where it operates. To the extent that any local law provides additional or greater rights to data subjects than those set out in this Policy, such rights shall apply in accordance with the relevant local law.

## **10. Data Security**

PayAlo implements technical and organizational measures designed to protect Personal Data against unauthorised and unlawful access, loss, misuse, alteration, disclosure or destruction in accordance with applicable laws and regulations.

No system can be guaranteed to be completely secure. However, PayAlo takes reasonable steps to protect Personal Data processed through its Platform and services.

## **11. Data Retention**

PayAlo retains Personal Data only for as long as necessary for the purposes for which it was collected, and according to the legal obligations, including to:

- a. provide the PayAlo services;
- b. maintain merchant accounts;
- c. support transaction notification, reconciliation and audit records;
- d. resolve disputes;
- e. prevent fraud or misuse;
- f. comply with legal, regulatory, tax and accounting obligations;
- g. enforce contractual rights; and
- h. maintain security and operational logs.

Retention periods may vary depending on the type of data, the purpose of processing, contractual requirements and applicable law.

PayAlo retains Personal Data for as long as necessary to fulfil the purposes for which it was collected, including complying with applicable legal and regulatory obligations.

When Personal Data is no longer required, PayAlo will delete, anonymise or securely archive it in accordance with applicable requirements.

If for any reason you wish to delete your Personal Data, please send us an e-mail to: [dpo@payalo.com](mailto:dpo@payalo.com), and we will make reasonable efforts to address your request.

## **12. Cookies and Tracking Technologies**

Our Website and Platform may use cookies, pixels, tags, local storage and similar technologies, to *inter alia*:

- a. enable Website and Platform functionality;
- b. remember user preferences;
- c. authenticate users;
- d. improve performance;
- e. analyse usage;
- f. support security; and
- g. assist with communications and service improvement.

Where required by law, we will obtain your consent before using non-essential cookies.

You can learn more about our use of Tracking Technologies by visiting our Cookie Policy.

### 13. Marketing Communications

We may send business communications, service updates, newsletters or marketing messages where permitted by law and upon obtaining your prior consent where necessary.

You may opt out of marketing communications at any time by using the unsubscribe link in our emails or by contacting us directly. Please note that we may still send you non-marketing communications relating to your account, services, security, legal notices or contractual matters.

### 14. Your Rights

Depending on the jurisdiction you reside in, you may have the following rights:

- a. right of access to your Personal Data;
- b. right to request correction of inaccurate or incomplete data;
- c. right to request deletion of your Personal Data;
- d. right to restrict processing – You have the right to request that PayAlo restricts certain processing of your Personal Data;
- e. right to object to processing – You have the right to object to processing of your Personal Data based on legitimate interests or for direct marketing purposes. Where you object to direct marketing, we will stop processing your Personal Data for that purpose;
- f. right of data portability - You have the right to request us to move, copy and transfer your Personal Data easily from one IT environment to another, in a safe and secure way, without affecting its usability;
- g. right not to be subject to automated decision-making – You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you, except where such decision is necessary for entering into or performing a contract, is authorised by law, or is based on your explicit consent;
- h. right to withdraw your consent - To the extent we process Personal Data on the basis of your consent, you have the right to withdraw your given consent at any time.
- i. right to lodge a complaint – You have the right to lodge a complaint with your competent data protection supervisory authority. For users in the European Economic Area, this may include the supervisory authority of your country of residence. As PayAlo is established in Cyprus, the competent supervisory authority for PayAlo is the Commissioner for Personal Data Protection of Cyprus (Γραφείο Επιτρόπου Προστασίας Δεδομένων Προσωπικού Χαρακτήρα), which can be contacted at: Address: 1 Iasonos Street, 2nd Floor, 1082 Nicosia, Cyprus; Telephone: +357 22 818 456; Fax: +357 22 304 565; Email: [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy); Website: [www.dataprotection.gov.cy](http://www.dataprotection.gov.cy).

All requests, complaints or queries to PayAlo may be addressed to [info@payalo.com](mailto:info@payalo.com) with the subject 'Privacy'. We will consider any requests, complaints or queries and provide you with a reply in a timely manner and in accordance with our regulatory obligations. **We take our obligations seriously and we ask that any concerns are first brought to our attention, so that we can try to resolve them.**

To exercise your rights, please contact us using the details set out in this Privacy Policy.

We may need to verify your identity before responding to a request. Certain rights may be limited where we are required to retain data for legal, regulatory, security, contractual, audit or dispute-resolution purposes.

### 15. Merchant Responsibility for Customer Data

Where a merchant provides PayAlo with Personal Data relating to its customers, users or payers, the merchant is solely responsible for ensuring that:

- a. it has a valid legal basis to collect and share such data with PayAlo;
- b. it provides all required privacy notices to its customers;
- c. it obtains all necessary consents where required;
- d. the data provided to PayAlo is accurate, relevant and lawful;
- e. PayAlo is authorised to process the data for the purpose of providing the services; and
- f. the merchant complies with all applicable data protection, consumer protection, payment, gambling, telecommunications and other relevant laws.

## **16. Minors**

PayAlo's services are intended for business users and users who are at least eighteen (18) years of age or older, and can form legal binding contracts under applicable law. We do not knowingly collect or solicit Personal Data from anyone under 18 years of age and we reserve the right to request proof of age at any stage. By accessing, using or interacting with our Services, you certify to us that you are not under 18 years of age. In the event we learn that we have collected Personal Data from an individual under 18 years of age without verification of parental consent, we will delete that information upon discovery. If you believe that we might have any information from or about an individual under 18 years of age, then please contact us through the contact details available below.

Where PayAlo processes transaction-related data on behalf of a merchant, the merchant is responsible for ensuring that its own services comply with all age restrictions and applicable laws.

## **17. Automated Decision-Making**

PayAlo may use automated tools to support fraud prevention, security monitoring, transaction-status handling, routing, error detection and Platform performance.

Unless expressly stated otherwise, PayAlo does not engage in automated decision-making that produces legal or similarly significant effects on individuals without appropriate safeguards as required by Article 22 GDPR. Where we do use any automated processing as part of our fraud prevention or security measures, such processing is either based on your explicit consent, necessary for the performance of a contract, or authorised by applicable law, and you have the right to obtain human intervention, express your point of view and contest the decision.

## **18. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time to reflect changes in our services, legal requirements, operational practices or technology.

The updated version will be posted on our Website or otherwise made available. The "Effective Date" at the top of this Privacy Policy will indicate when it was last updated.

Where required by law, we will notify you of material changes.

## **19. Data Protection Officer**

PayAlo has appointed a Data Protection Officer ("DPO") who is responsible for overseeing questions in relation to this Privacy Policy and our data protection practices. If you have any questions about this Policy or wish to exercise your data protection rights, please contact our Data Protection Officer at:

[dpo@payalo.com](mailto:dpo@payalo.com). The DPO can also be reached by mail at: PayAlo Ltd, Attn: Data Protection Officer, Troodous 20, IOANNOU TOWER, Agios Athanasios, 4105, Limassol, Cyprus.

## **20. Contact Us**

If you have any questions about this Privacy Policy or how PayAlo processes Personal Data, please contact us at:

### **PayAlo Ltd**

Address: Troodous 20, IOANNOU TOWER, Agios Athanasios, 4105, Limassol, Cyprus

Email: [info@payalo.com](mailto:info@payalo.com)