



Privacy policy

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Current version is effective as from 27 November 2025

Introduction

This Privacy Policy describes how companies constituting the Globitex group collect, use, store, share, and protect clients' personal data while client uses Globitex group services and Websites or by corresponding with Globitex group companies (for example, by email or via the internal messaging functions or the Website).

Globitex group only collects the information that is necessary and will not share clients' personal information with any third parties unless it is necessary. Even within the Globitex group, access to clients' personal information is limited to only those employees who require such information to handle matters relating to compliance, identity verification, fraud prevention, and customer support.

BEFORE OPENING A NEXDESK OR NEXPAY ACCOUNT, GLOBITEX GROUP ADVISE CLIENTS TO CAREFULLY READ THIS PRIVACY POLICY. IF ANY QUESTIONS ARISE, CLIENTS ARE ENCOURAGED TO CONTACT HEREIN MENTIONED DATA PROTECTION OFFICER.

If the Client does not agree with this Privacy Policy, then the Client should refrain from using Globitex group services or opening an Account with Globitex group. This Privacy Policy is an integral part of the respective Globitex group terms and conditions to use all or some of Globitex group services.

Globitex group may change or update this Privacy Policy from time to time. Whenever these changes are made, an updated complete version and/or consolidated version of the Privacy Policy will be uploaded to the Websites with the respective date of commencement. If the changes to the Privacy Policy are significant, an overview will be posted in the "News" section at the Websites, and a notification will appear when opening the Websites each time it is opened from a new device.

1. DEFINITIONS

- 1.1. **Application form** – an online application on the Globitex group websites that clients complete and submit to open an account with Globitex group. If the online application is unavailable at the time of onboarding or during business continuation, Globitex group may request the client to complete the application form in PDF format instead.
- 1.2. **Client** – an individual who can be identified, directly or indirectly, in particular by reference to – an identifier such as a name, an identification number, location data or an online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual, which has opened the Globitex group websites;
- 1.3. **Data subject** – identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 1.4. **Globitex group** – a group of Globitex Holding AS (incorporated and operating under Latvian law, registration code 40103916205, registered office address at Mihaila Tala street 1, LV-1045 Riga, Latvia) registered subsidiary companies consisting of:
 - 1.4.1. (i) Nexpay UAB, incorporated and operating under Lithuanian law, registration code 304708124, registered office address at Žalgirio g. 90-100, LT-09303 Vilnius, Lithuania;

- 1.4.2. (ii)** Nexdesk SIA, incorporated and operating under Latvian law, registration code 40203611803, registered office address at Mihaila Tala street 1, LV-1045 Riga, Latvia;

Nexpay UAB and Nexdesk SIA are both AML-obliged entities, the allocation of GDPR roles depends on the purpose of processing:

- When the Nexpay UAB collects and processes personal data to fulfil its own AML legal obligations under the Law of the Republic of Lithuania on Prevention of Money Laundering and Terrorist Financing and shares such data with the Nexdesk SIA under Latvian Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing §47², the Nexpay UAB acts as a controller, and the Nexdesk SIA acts as an independent controller and recipient.
- When the Nexpay UAB collects and processes personal data based on Nexdesk SIA's instructions for Nexdesk SIA's AML purposes, Nexdesk SIA is the controller and recipient, and the Nexpay UAB acts as its processor.

1.5. GDPR – REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);

1.6. Privacy Policy – this Privacy Policy was drafted and issued by Globitex group;

1.7. Personal data – any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Globitex group does not consider personal data to include information that has been anonymised;

1.8. Services has the meaning of the services provided by any company of Globitex group to its Clients;

1.9. Third party – a natural or a legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;

1.10. Globitex group websites – <https://paynexpay.com/> and <https://nexdesk.io/>.

2. Personal data collected by Globitex group

2.1. General

2.1.1. In order to provide the Client with Services, Globitex group collects various types of the Client's Personal Data.

2.1.2. Personal Data is collected and used during 3 principal steps: registration, identity verification, and the use of Services.

2.2. Processing of registration data

2.2.1. During the registration process, Globitex group collects some important details about the Client, such details may include name, surname, and email address. Submission of herein mentioned Personal data is mandatory for registration. Failure to provide any of this data or decision to delete or object to the processing of any of such data will result in dismissal of the Client's registration.

- 2.2.2.** In case the Client has not finished his/her registration and has not deleted all his/her Personal data submitted in the registration form Globitex group will understand it as the Client's request for Globitex group to take steps before entering into contract and Globitex group may contact the Client in order to assist with registration for the Services.
- 2.2.3.** Finalizing registration, the Client will have to confirm his/her email address and/or phone number provided after the respective message is sent to it.
- 2.2.4.** After providing Personal data for registration the Client can continue with application for the Services. For this purpose, Globitex group needs to request more information in order to meet legal and regulatory obligations. Therefore, proceeding with the application the Client should provide Globitex group additional Personal Data, which may include data as such: phone number, date of birth, nationality, personal ID number, address of residence, information regarding status of politically exposed person and residency of the USA, copy of identification document (ID, Passport), photograph and any other required information in order to prove Client's eligibility to use the Services. Submission of herein mentioned Personal data is mandatory to be able to access and use the Services. Failure to provide mentioned Personal data will lead to dismissal of the application for the Services.
- 2.2.5.** Sometimes Globitex group may be required to collect more information to identify the Client or to meet legal and regulatory obligations. When that is necessary, the Client will be prompted to provide such information.
- 2.2.6.** If the Client contacts Globitex group, Globitex group will keep a record of that correspondence.
- 2.2.7.** Personal data collected by Globitex group in the registration step is used for the following purposes:
- 2.2.7.1.** Account opening with Globitex group;
 - 2.2.7.2.** Client's identification;
 - 2.2.7.3.** Client's risk assessment is mandatory in accordance with the applicable legal and regulatory requirements;
 - 2.2.7.4.** Provide clients with support, letting them know about upcoming changes or improvements of Websites;
 - 2.2.7.5.** Provide clients with the information regarding changes of any terms and conditions applicable to them or Services they use, as well as other important information.
- 2.2.8.** Globitex group processes Clients registration data on the legal basis of:
- 2.2.8.1.** Client's consent, expressed when voluntarily submitting and filling Client's Personal Data details in Globitex registration form which are not mandatory to fill in; and
 - 2.2.8.2.** Conclusion and performance of contractual arrangements and obligations between Globitex group and the Client; and for the compliance with legal and regulatory requirements to which Globitex group is a subject. The Client may at any time edit, update or delete his/her contact details contacting Globitex group. Please note that the Client will be able to request deletion of his/her contact details and other registration data only if there is no legal obligation for Globitex group to preserve such data by the applicable laws.
- 2.3. Processing of Client verification data**
- 2.3.1.** In order for the Client to use the Services, the Client must verify his/her identity. Globitex group verifies the Client by the Personal data provided by the Client during registration process. However, such Personal data must be confirmed, therefore, in addition, for the verification purposes Globitex

group also relies on the verification services, managed and provided to Globitex group by Globitex group service providers.

- 2.3.2.** While performing this verification step, the Client will be requested to upload his/her ID document and undergo facial verification. For the mentioned purposes Globitex group receives and relies on a certain confirmation from Globitex group service providers that the Client's identity is verified. Please note, that under the applicable legal and regulatory requirement Globitex group is obligated to collect and store all data received during the Client's identification and verification process; therefore, copies of ID documents, data related to the facial recognition and other information will be stored by Globitex group in accordance to this Privacy policy and applicable legal and regulatory requirements.
- 2.3.3.** Globitex group may request the Client to provide further information that will allow Globitex group to reasonably identify the Client and verify his/her identity. Globitex group reserves the right to contact the Client and to request to provide more information or confirm that the provided information is correct, accurate, up-to-date and valid.
- 2.3.4.** Globitex group retains its rights to invite the Client to participate in a video-call between the Client and Globitex group. These video calls will be conducted exceptionally, on the sole decision of Globitex group. The video call will be no more than 5 (five) minutes long, the sound and image of the video call has to have such a level of quality where the Client can be clearly seen and heard. During the time of the video call, the Client will have to show his/her identification document (passport or national ID card) and other documents, that he/she has submitted to Globitex group as well as other documents that have been requested by Globitex group in order to confirm the identity of the Client. During such a video call the Client may be requested to provide any other information required for Globitex group to comply with its legal and regulatory requirements.
- 2.3.5.** Globitex group processes the above-mentioned Personal data used for Client's verification in order to comply with its legal and regulatory requirements, as well as to ensure that the Clients are not attempting to create additional Accounts or to commit fraudulent actions. Refusal to undergo identity verification will terminate Client's application to use the Services process.
- 2.3.6.** Processing of the Client's ID document and facial verification data uploaded to a third-party database as described above is covered by the respective third party's privacy policy. The Client will be notified about the respective third party performing the Client's verification process before starting such process. The Client is advised to carefully review the privacy policy of such third parties before starting the verification process.

2.4. Processing of data generated while using the Websites

- 2.4.1.** To provide quality user experience for the Client, Globitex group creates a possibility to use the Services through the Websites. While the Clients are using the Websites, Globitex group collects and processes:
 - 2.4.1.1.** Client's login history for the security purposes;
 - 2.4.1.2.** history and other information of the Client's actions while using the Websites in order to:
 - (i) ensure the functionality of the Websites and to provide further updates and improvements, (ii) ensure compliance with a legal and regulatory requirement applicable to Globitex group.

2.5. Processing of data generated while using the Services

- 2.5.1.** While the Clients are using the Services, Globitex group collects the following information:

- 2.5.1.1. History of transactions (date, information of the payer and payee, amount of the transaction) is processed in order to: **(i)** ensure functionality of the Websites and to provide further updates and improvements, **(ii)** ensure compliance with legal and regulatory requirements;
 - 2.5.1.2. Internal messaging history, including, but not limited to, claims and complaints made by the Client are processed in order to ensure due and timely performance of the obligations regarding the provision of the Services. Please note, that the Client should limit personal information and details provided during internal messaging to the extent necessary for the Services provision or asked by Globitex group;
 - 2.5.1.3. The Client's behaviour, while using the Services (the Client's clicks, visited sections) is processed in order to ensure the improvements of the functionality of the Websites;
 - 2.5.1.4. The Client's message content: if the Client includes a message with his/her payments detail, the content of that message is stored by Globitex group;
 - 2.5.1.5. The Client's photos/documents: if the Client provides photos/documents to Globitex group while using the Services, Globitex group will save and store these photos/documents for as long as the Client uses the Services and for a certain period after termination of provision of the Services in accordance with legal and regulatory requirements applicable to Globitex group;
 - 2.5.1.6. Cookies: Globitex group uses cookies. Please see information on cookies used by Globitex group in Globitex group Cookie policy available on the Websites.
 - 2.5.2. Globitex group processes the Personal Data collected while using the Services on the following legal basis:
 - 2.5.2.1. Conclusion and performance of the contractual arrangements and obligations between Globitex group and the Client; and
 - 2.5.2.2. Pursuance of legitimate interests of Globitex group, as controller and manager of the Websites; and
 - 2.5.2.3. for the compliance with legal and regulatory requirements to which Globitex group is a subject.
 - 2.5.3. **Personal data of other individuals.** By providing personal data other than the Client's personal data to Globitex group, the Client confirms that Client has obtained necessary consents from such individuals to disclose his/her Personal Data for the collection and use. By providing such Personal data to Globitex group, the Client bears all the responsibility towards such individual if the Client has not obtained proper consents for such provision and the Client undertakes to indemnify Globitex group for any liability which may appear due to unlawful provision and/or disclosure of the Personal Data made by the Client.
 - 3. **Other purposes for use of Personal Data**
 - 3.1. **Developing the Websites**
 - 3.1.1. Globitex group uses the Personal data to conduct research and development of the Websites and the Services in order to provide the Clients and others with a better, more intuitive and personalized experience, driving membership growth.
 - 3.2. **Client support**

- 3.2.1. Globitex group uses the Personal data to keep in touch with the Clients in order to provide Clients with the customer service, notify the Clients on news and updates, and provide the Clients with the security notices or information.

3.3. Security and investigations

- 3.3.1. Globitex group uses the Personal data for security, fraud prevention and investigations purposes. Globitex group uses the Client's Personal data (including communication) if Globitex group thinks it is necessary for security purposes or to investigate possible fraud or other violations of the Services, the Client's contractual obligations, this Privacy Policy, complying with the legal and regulatory requirement applicable to Globitex group.

3.4. Providing information on similar products and services

- 3.4.1. Globitex group uses the Personal data to provide the Clients with information about other goods and services Globitex group offers or may offer in the future that are similar to those that the Client already uses.

3.5. Third Party Information

- 3.5.1. Globitex group will combine the Personal data with the information that Globitex group has collected about the Client and will use this information to help better understand the Client's circumstances and behaviour so that Globitex group may be able to make decisions regarding provision of the Services to the Client.

4. Personal data received from third parties

- 4.1. Globitex group collects and receives the Client's Personal data from the Client, as well as from the following sources:
 - 4.1.1. Business partners, sub-contractors in technical, services, advertising networks, analytics providers, search information providers, credit reference agencies, fraud prevention agencies, customer service providers and developers. Information that Globitex group may collect about the Client from such parties can include credit search information, information which helps Globitex group to verify Client's identity or information relating to Client's transactions or other circumstances related to the Client;
 - 4.1.2. Other legal sources, such as public registers, internet search engines, public sources such as social media.
- 4.2. If a person is a beneficial owner, shareholder, representative or an employee of Globitex group business client Globitex group collects the Personal data in order to fulfil legal and regulatory obligations applicable to Globitex group. In such a case, the respective Personal data is provided to Globitex group by the representatives of the business client. The Personal data received under this clause is processed in accordance with this Privacy policy and the person has all the rights of the Data subject listed herein in this Privacy policy and in the applicable laws.

5. Sharing of personal data

- 5.1. In order to provide the Clients with the Services and meet legal and regulatory requirements applicable to Globitex group Globitex group uses third parties' services and such third parties use the Personal Data in delivering their services to Globitex group. Therefore, Globitex group may share the information collected about the Client with Globitex group service providers (Data processors) such as:

- 5.1.1. Storage/server providers. Globitex group uses their service in order to store the Clients' data safely and securely;
- 5.1.2. In order to prevent fraud, Globitex group might need to share the Client's information with third party identity verification services. This will allow Globitex group to make sure the Clients do not hide their identity, by comparing the information the Client has submitted to the public records and other third party databases;
- 5.1.3. Auditors, accountants and lawyers: In order to complete financial, technical and legal audits of Globitex group operations or to provide Globitex group with the respective services, Globitex group may need to share some information about the Client as part of such audit or in service;
- 5.1.4. In order to improve Globitex group functionality, anonymised data can be shared with service providers that helps Globitex group to analyse how people are using its services;
- 5.1.5. Globitex group affiliated entities as necessary in order to provide the Client with the best possible product and customer support.
- 5.2. Globitex group may also share the Client's Personal Data with following third parties:
 - 5.2.1. Globitex group will share client's payment account information with the payment services providers in order for the payments to be processed;
 - 5.2.2. Globitex group may need to share the Client's information with its supervisory authorities, law enforcement agencies or government officials. Globitex group will only do this when compelled to do so by the law or formal request, or otherwise believe in good faith that Globitex group needs to share such information to prevent physical harm, financial loss or is obligated to report illegal activity.
 - 5.2.3. If any company of the Globitex group merges with or gets acquired by another entity, it will have access to the information provided by the Clients. In such circumstances, Globitex group will ensure that the new entity follows this Privacy Policy, the GDPR and will notify all Clients of any such changes.
 - 5.2.4. Globitex group can share the Client's Personal Data with other third parties, only in case when the Client has explicitly authorised Globitex group to do so.
- 6. **Sharing with other Globitex group clients**
 - 6.1. Globitex group may share the Client's Personal data with other Globitex group clients to provide the Services to the Client (e.g., executing payments to other Globitex group clients). Globitex group may introduce new features and services that may require sharing the Client's Personal data. In that case, Globitex group will notify all of its clients before activation of such new services.
- 7. **Processing Personal Data inside and outside the EEA**
 - 7.1. The Personal Data that Globitex group collects from the Clients will be transferred to, and stored at, a destination inside the European Economic Area (EEA).
 - 7.2. The Personal Data may be processed outside of the EEA in order for Globitex group to fulfil Globitex group contractual obligations towards the Clients and be able to provide the Services. Globitex group will need to process the Client's Personal Data in order for Globitex group, for example, to action a request made by the Client to execute an international payment, process Clients payment details, provide global anti-money laundering and counter terrorist financing solutions and provide ongoing support services. Globitex group will take all steps to ensure that the Clients data is treated securely and in accordance with this Privacy Policy.

- 7.3.** The Client's Personal Data may be transferred outside EEA. The Client's Personal Data is transferred outside the EEA if the following conditions are met:
- 7.3.1.** Personal data is transferred only to reliable partners of Globitex group to ensure provision of the Services to the Clients;
- 7.3.2.** Data processing agreements are signed, and partners have made obligations to ensure the security of Client's Personal Data as required by the law;
- 7.3.3.** The commission of the European Union has made a decision of security level adequacy of the country in which Globitex group partner is established; an appropriate level of security is ensured.

8. Rights of the Clients

- 8.1.** The Clients are entitled to the following rights regarding the protection of their Personal Data:
- 8.1.1. The right to request access to the information processed about the Client by Globitex group:** this right enables the Client to receive a copy of the Personal Data stored about the Client by Globitex group;
- 8.1.2. The right to request to correct incorrect / inaccurate information:** this right enables the Client to have any incomplete or inaccurate Personal Data stored by Globitex group to be corrected. If the Client needs to add or change any information (for example, personal contact information), it can be done by logging into his/her account and making any necessary changes to the account details. Certain details – name, surname, financial information etc. – can only be changed through Globitex group client support (support@nexpay.com or support@nexdesk.io).
- 8.1.3. The right to request to transfer all or part of the Personal data:** This right enables the Client to ask Globitex group to provide the Client with his/her Personal data in a structured, commonly used, machine-readable format, which the Client can then transfer to another appropriate data controller. Note that this right only applies to automated information which the Client initially provided for Globitex group to use and consented for it to use or where Globitex group used the information to provide the Services to the Client.
- 8.1.4. The right to request erasure of the Personal data:** This right enables the Client to ask Globitex group to delete or remove the Personal Data where there is no good reason for Globitex group to process it, or if the Client has successfully exercised the Client's right to object to processing. Please note that Nexpay UAB is obligated under the Law on Prevention of Money Laundering and Terrorist Financing of the Republic of Lithuania, and Nexdesk SIA is obligated under the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing of the Republic of Latvia, as well as other laws applicable towards them to retain certain information the Client has provided for a number of years, therefore, it may not be always possible to comply with the Client's request of erasure for the mentioned reasons. The Client will be notified at the time of the Client's request if the situation is as described.
- 8.1.5. The right to request restriction of Personal data processing:** This right enables the Client to ask Globitex group to suspend the processing of his/her Personal data. Please note, that such requests may lead to a situation that Globitex group may not be able to perform its contractual obligations towards the Client or enter into an agreement with the Client. If this would be the case, Globitex group will notify the Client about it.
- 8.1.6. The right to object to processing of Personal Data when processing is carried out on the basis of legitimate interest:** This right can be exercised in a situation where Globitex group is relying on its legitimate interest (or those of a third party), however, in the Client's particular situation such

processing impacts on the Client's fundamental rights and freedoms. The Client also has the right to object where Globitex group is processing the Client's Personal data for direct marketing purposes. Please note that Nexpay UAB and Nexdesk SIA are required under their respective applicable laws on the prevention of money laundering, terrorism financing, and related compliance obligations – including, for Nexdesk SIA, the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing of the Republic of Latvia – to process certain Client Personal Data for compliance purposes; therefore, in some cases Globitex group may demonstrate that Globitex group has compelling legitimate grounds to process the Client's Personal data which overrides the Client's rights. Requirements of the mentioned laws supersede any right to objection under applicable data protection laws. If the Client objects to the processing of certain Personal data, then Globitex group may not be able to provide the Client with the Services.

- 8.1.7.** To exercise any of the rights mentioned above, the Client will have to reach out to Globitex group client support by email to the address support@nexpay.com or support@nexdesk.io. Globitex group may ask the Client to verify his/her identity and provide Globitex group with more information regarding the Client's request.

9. Personal data retention

- 9.1.** Nexpay UAB and Nexdesk SIA are required under their respective applicable laws on the prevention of money laundering, terrorism financing, and other regulatory obligations – including, for Nexdesk SIA, the Law on the Prevention of Money Laundering and Terrorism and Proliferation Financing of the Republic of Latvia – to retain Client Personal Data for a legally mandated number of years;
- 9.1.1.** Client identification data and verification data – eight years after termination of the business relationship with the Client; and
- 9.1.2.** History of transactions – five years after termination of the business relationship with the Client.
- 9.2.** Nexpay UAB and Nexdesk SIA therefore use this retention requirement as a benchmark for all Personal data that they receive from the Clients. In order to not store the Client's information for longer than it is strictly necessary, Nexpay UAB and Nexdesk SIA will not store any of the Client's Personal data for more than 10 years after the termination of the business relationship.

10. Protection of personal data

- 10.1.** Globitex group protects the Client's Personal data using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration. Some of the safeguards Globitex group uses are firewalls and data encryption, physical access controls to its servers, and information access authorisation controls. In order to better secure the Client's Personal data and ensure that it is used for the purposes contemplated by this Privacy Policy, certain Personal data may be stored with Globitex group third party partners and service providers. All of Globitex group physical, electronic and procedural safeguards are designed to comply with applicable laws and regulations.

11. Complaints

- 11.1.** Globitex group would appreciate the chance to deal with any of the Client's concerns regarding the Personal data and will try to find a solution at the Client's satisfaction. Thus, please contact Globitex group in the first instance. The Client also has the right to lodge a complaint to the national Data Protection Agency (DPA) in the country of the Client's residence in the event where the Client's rights may have been infringed.

12. Globitex group data protection officer

- 12.1.** Globitex group has appointed a Data protection officer (DPO). In case of any questions or concerns related to the Personal data, the Data subjects can easily contact the Data protection officer by email at the address dpo@globitex.com. Globitex group commits to resolve complaints about the collection and/or use of the Personal Data. Inquiries and/or complaints from the Clients regarding this Privacy Policy or a treatment of the Personal data and information has to be addressed to either to support@nexpay.com or support@nexdesk.io.