

HOLYMINT PRIVACY POLICY

1. INTRODUCTION

This Privacy Policy (“Policy”) applies to FundFlow s.r.o., a company incorporated under the laws of the Czech Republic, registered in the Commercial Register maintained by the Municipal Court in Prague under number 21912904, with its registered office at Michelská 966/74, Michle, 141 00 Praha 4 (hereinafter as “we”, “us”, “our” or “Company”), as the operator of the online services known commercially as HolyMint (the “HolyMint” or “Services”), accessible at <https://holymint.cards/>.

This Policy explains how the Company collects, uses, processes, stores and shares personal data when you use the Services or otherwise interact with our Services*.

We are committed to protecting your privacy and ensuring the security of your personal information, especially sensitive, payment data.

2. DATA CONTROLLER

The Company acts as the Data Controller under the EU General Data Protection Regulation (EU) 2016/679 (“GDPR”) and applicable Czech data protection laws, i.e. The Personal Data Processing Act 2019 (No. 110/2019 Coll.)

3. WHAT DATA WE PROCESS

We may process, collect, use, store and share the following categories of personal data:

- (i) Identification details (name, date of birth, nationality, ID/passport details);
- (ii) Contact details (address, email, phone number, country of incorporation – if applicable);
- (iii) Financial information (transaction history, Virtual Card* details);
- (iv) Verification data (proof of residence under address, source of funds);
- (v) Technical data (IP address, device identifiers);
- (vi) Account management data (roles, permissions, user activity logs).

4. PURPOSE OF PROCESSING

We process the personal data for the following, legitimate purposes:

- (i) Provision of the Services – i.e. by processing payments, issuing Virtual Cards;
- (ii) Fraud prevention & security – monitoring suspicious activity and complying with the obligations towards us;
- (iii) Legal obligations – to properly fulfilling obligations under local and the EU law;
- (iv) Customer Support – handling inquiries, complaints, feedback and support delivery;
- (v) Marketing – as set fort in Section 9 and *HolyMint* Terms and Conditions.
- (vi) Website performance – improving usability, security and analytics.

5. LEGAL BASIS OF PROCESSING

We process personal data based on:

- (i) Arrangement performance – Art. 6(1)(b) GDPR;
- (ii) Legal obligations – Art. 6(1)(c) GDPR, i.e. by AML/CFT compliance;
- (iii) Legitimate interest – Art. 6(1)(f) GDPR – i.e. by fraud prevention, security monitoring;
- (iv) Your consent – Art. 6(1)(a) GDPR – for optional marketing communication or specific data sharing.

6. DATA SHARING

6.1. We may share personal data obtained on the basis set forth in this Policy with:

- (i) Payment schemes;
- (ii) Banks and payments processors;
- (iii) Card issuers;
- (iv) Third-Party Funding Provider*;
- (v) Regulatory Authorities;
- (vi) Sanctions and fraud preventions databases;
- (vii) Third-Party contractors cooperating with us, ensuring the proper data security on their end.

6.2. We may transfer personal data outside the European Economic Area (EEA), where the data was initially collected, including to jurisdictions that may not provide the same level of data protection. When transferring data outside the EEA, the United Kingdom, or Switzerland, we rely on Standard Contractual Clauses (SCCs), approved by the European Commission, or other legally approved mechanisms to ensure an adequate level of data protection.

7. DATA RETENTION

7.1. We retain personal data for as long as required by law, maximum of 10 (ten) years after the end of the business relationship or account closure so that we meet AML/CFT obligations.

7.2. After the retention period expires, personal data will be securely deleted or anonymized in accordance with GDPR requirements.

8. YOUR RIGHTS UNDER GDPR

8.1. As established in the GDPR, you, as the data subject, have the right to:

- (i) Access your personal data;
- (ii) Request correction of inaccurate data;
- (iii) Request erasure (subject to legal retention requirements);
- (iv) Restrict or object to processing and profiling;
- (v) Data portability;
- (vi) Withdraw consent at any time (without affecting lawfulness of prior processing);
- (vii) Lodge a complaint to the Office for Personal Data Protection (ÚOOÚ) in the Czech Republic or another competent supervisory authority within the EU.

8.2. To exercise your rights set forth above, you can submit a request by sending it by mail or by e-mail. The request must provide sufficient details that allow us to properly understand, evaluate, and respond to it (should be clear, include your name, information about what rights and to what

extent you wish to exercise, and how you would like to receive a response and the request must be signed). If you submit the request electronically, the information will also be provided electronically, unless you request in advance to be performed in a different format

8.3. We will endeavor to process your request and provide you with the information as soon as possible, but no later than thirty (30) calendar days from the date of the receipt of your request.

9. DIRECT MARKETING

9.1. We may use your personal data for direct marketing purposes in order to provide you with offers, promotions and information about our Services (e.g. new products, service features, or special discounts), but only if you have provided your explicit consent.

9.2. You have the right to withdraw your consent to receive direct marketing communications at any time by contacting us at info@holymint.cards. Withdrawal will not affect the lawfulness of processing carried out before the withdrawal.

9.3. We will not share your personal data with third parties for their own marketing purposes without your explicit consent.

10. ACCOUNT CLOSURE AND DATA HOLDING

10.1. Upon account closure, we will retain your data for the legally required retention period described in Section 7 of this Privacy Policy.

10.2. Personal data will be processed solely for the purposes of meeting legal and regulatory requirements during the reporting period.

10.3. At the end of the retention period, personal data will be securely deleted or anonymized in accordance with GDPR requirements.

11. SECURITY

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, alteration, disclosure, or destruction, i.e. by encryption for data transmission, access & control monitoring, and regular penetration testing and audits.

12. CONTACT US

For any questions or concerns regarding this Privacy Policy, your personal data, or to exercise your rights, please contact us at:

Email: info@holymint.cards

Address: FundFlow s.r.o. Michelská 966/74, Michle, 141 00 Praha 4, Praha.

13. PRIVACY POLICY UPDATES

We may change this Privacy Policy from time to time based on the changes to applicable laws and regulations or other requirements applicable to us, changes in technology, or changes to our business. Any changes we make to this Privacy Policy will be posted on our website at <https://holymint.cards/>.

This Privacy Policy was last updated in August 2025.

*As defined in *HolyMint* Terms and Conditions.