



## Privacy Policy

Updated June 2024

## **Privacy Policy (updated June 2024)**

We (“Amanacard”) are committed to maintaining the confidentiality and security of your Personal Information. Please read the following terms of the Privacy Policy carefully to understand our practices and how we will treat your Personal Information.

Amanacard is registered as a data controller with the UK Information Commissioner’s Office with registration number ZA344270. This Privacy Policy describes how Amanacard collects and uses your personal information, including the information you provide on the portal: [www.myamana.direct](http://www.myamana.direct), owned and operated by Huozhi Ltd (“we”, “us”, or “our”). It also describes the choices available to you regarding our use of your personal information and how you can access and update this information.

Amanacard is concerned with protecting the privacy of any personal information that you may choose to provide to us (“Personal Information”). Amanacard will attempt to ensure that the use of your Personal Information is compliant with the General Data Protection Regulation, (Regulation (EU) 2016/679) (“GDPR”) and Canada’s Federal Personal Information Protection and Electronic Documents Act, S.C. 2000, ch. 5 (“PIPEDA”). Accordingly, Amanacard issues this policy to inform you of our use of your Personal Information.

### **1. INTRODUCTION**

1.1 This Privacy Policy sets out the way in which Amanacard collects and processes Personal Information, as well as the steps we take to protect such information.

1.2 By utilising our Services, you acknowledge that you have read, and agree to, the terms of this Privacy Policy and that you consent to the use by Amanacard of your Personal Information for the purposes set out in paragraph 3 of this Privacy Policy. If you do not wish to provide your Personal Information on the basis set out in this Privacy Policy, you should not enter the relevant information on the Portal or provide your Personal Information to us otherwise. However, if you do not provide your Personal Information, you may not be able to use all or part of the Services we offer.

1.3 Capitalised terms not defined in this Privacy Policy shall be as defined in the User Agreement.

1.4 This portal [www.myamana.direct](http://www.myamana.direct) is operated by Huozhi Ltd.

1.5 Definitions:

1.5.1 “You” means the user who is using the services of Amanacard.

1.5.2 “Personal Data” means information that specifically identifies an individual or that is linked to information that identifies a specific individual.

1.5.3 “Visitor” means an individual other than a user, who uses the public area, but has no access to the restricted areas of the Portal or Service.

1.6 Principle. This policy is based on the following data protection principles:

1.6.1 The processing of personal data shall take place in a lawful, fair and transparent way;

1.6.2 The collecting of personal data shall only be performed for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

1.6.3 The collecting of personal data shall be adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed;

1.6.4 The personal data shall be accurate and where necessary, kept up to date;

1.6.5 Every reasonable step shall be taken to ensure that personal data that are inaccurate having regard to the purposes for which they are processed, are erased or rectified without delay;

1.6.6 Personal data shall be kept in a form which permits identification of the data subject for no longer than it is necessary for the purpose for which the personal data are processed;

1.6.7 All personal data shall be kept confidential and stored in a manner that ensures appropriate security;

1.6.8 Personal data shall not be shared with third parties except, when necessary, in order for them to provide services upon agreement;

1.6.9 Data subjects shall have the right to request access to and rectification or erasure of personal data, or restriction of processing, or to object to processing as well as the right of data portability.

## **2. INFORMATION THAT WE COLLECT**

2.1 As part of providing, you with the Services, we collect your Personal Information on registering an account. "Personal Information" means any information from which you can be personally identified:

2.1.1 we may collect, store and use information about your computer, mobile device or other item of hardware through which you access the Portal and your visits to and use of the Portal (including without limitation your IP address, geographical location, browser/portal type and version, Internet Service Provider, operating system, referral source/exit pages, length of visit, page views, website navigation and search terms that you use;

2.1.2 to the extent that we collect and process documentation on behalf of our contributing foreign exchange companies to assist them with complying with various statutory requirements including without limitation anti-money laundering procedures, we may collect a copy of your passport, director and shareholder information, driving licence and evidence of proof of address. These documents contain various elements of personal and company information;

2.1.3 if you choose to subscribe to our Service, you will be required to enter your email address;

2.1.4 you may be given opportunities to provide us with other information from time to time;

2.1.5 when you contact us by email or telephone or through any contact form provided on the Portal, we may ask you to provide some or all the following information:

- a. your full name
- b. your address
- c. your email address; and/or
- d. details of any search effected by you and/or any transaction executed by you with any partner.

2.2 Not all the personal information we hold about you will come always directly from you. We may also collect information from publicly available websites (i.e Facebook, Google, Twitter, Instagram, LinkedIn), to comply with our legal and regulatory obligations, offer services we think may be of interest, to help us maintain data accuracy and provide and enhance the Service.

## **3. USAGE OF YOUR PERSONAL INFORMATION BY US**

3.1 We will process your Personal Information in accordance with the GDPR and to provide you with the Service. We will process your Personal Information to enable us to:

- a. to provide our services to you on the Portal;
- b. to assist our foreign exchange companies with providing their services to you;
- c. your email address; and/or
- d. to manage and administer the Portal;

- e. to send you newsletters and other relevant and targeted promotional communications;
- f. to notify you of changes we have made or plan to make to the Portal;
- g. to send you email and trade confirmations and a welcome email as necessary;
- h. to request feedback from you on any transaction effected by you through the Portal;
- i. to deal with enquiries, complaints and feedback from you and our Service providers;
- j. to provide third parties with statistical anonymised information about our users;
- k. to analysis and improve the services offered on the Portal.

3.2 If at any time you wish us to stop processing your Personal Information for the above purposes, then you must contact us and we will take the appropriate steps to stop doing so. Please note that this may mean that your Account will be closed. You may contact us by sending an email to [service@amanacard.com](mailto:service@amanacard.com).

3.3 To ensure a good quality of service we may monitor any communication you have with us whether in writing or by electronic mail ("Recordings") or any inbound and outbound calls done by any member of the Amanacard team. Any recordings remain the property of Amanacard and will be used only for the purposes listed above.

3.4 In the event that the purposes for processing change, then we will notify you as soon as practicable and seek any additional consent that may be required.

#### **4. DISCLOSURE OF YOUR PERSONAL INFORMATION**

4.1 Except as described in this Privacy Policy, we will not intentionally disclose the Personal Data that we collect or store on the Service to third parties without your prior explicit consent.

4.2 Except to the extent required by any applicable law or governmental or judicial body, we will only disclose such of your Personal Information to our foreign exchange companies as is required for us or them to perform our or their services to you.

4.3 We will use all reasonable endeavours to ensure that any foreign exchange companies to whom we disclose your confidential information is compliant with the Data Protection Act 1998 (or an equivalent standard) as regards its use and storage of your Personal Information.

4.4 Once you trade with one of any foreign exchange companies, you give permission for such contributing foreign exchange company to disclose Personal Information and transactional information to us for the following reasons:

- a. to enable us to track the amount of commission payments due to us from the broker;
- b. to enable us to contact you to request feedback on the transaction; and
- c. to improve our services to you by tailoring the Portal to your requirements.

4.5 In the event that we sell or buy any business or assets, we may disclose your Personal Information and transaction data to the prospective seller or buyer of such business or assets. If substantially all of the assets of Amanacard are acquired by a third party, personal data and transaction data held by it about its customers will be one of the transferred assets.

4.6 We will disclose your Personal Information if we are under a duty to disclose or share your personal data and transaction data in order to comply with any legal obligation, or in order to enforce or apply our Terms of Service and other agreements; or to protect the rights, property, or safety of Amanacard, the Portal, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

4.7 If at any time you wish us to stop processing your Personal Information for the above purposes, then you must contact us and we will take the appropriate steps to stop doing so. Please note that this may mean that your Account will be closed. You may contact us at [service@amanacard.com](mailto:service@amanacard.com).

## 5. DATA SUBJECT RIGHTS

5.1 We respect your privacy rights and provide you with reasonable access to the Personal Data that you may have provided through your use of the Services. Your principal rights under the GDPR are as follows:

- a. the right for information (a monetary charge may be levied on you to meet our costs in providing you with the details we hold about you);
- b. the right to access;
- c. the right to rectification;
- d. the right to erasure; the right to be forgotten
- e. the right to restrict processing;
- f. the right to object to processing;
- g. the right to data portability;
- h. the right to complain to a supervisory authority; and
- i. the right to withdraw consent.

5.2 If you wish to access or amend any other Personal Data we hold about you, or to request that we delete any information about you, you may contact us by sending an email to [service@amanacard.com](mailto:service@amanacard.com). We will acknowledge your request within seventy-two (72) hours and handle it promptly. Amanacard will respond to these requests within a month, with a possibility to extend this period for particularly complex requests in accordance with Applicable Law. We will retain your information for as long as your account is active, as needed to provide you Services, or to comply with our legal obligations, resolve disputes and enforce our agreements,

5.3 You may update, correct, or delete your Account information and preferences at any time by accessing your Account. Please note that while any changes you make will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

5.4 You may decline to share certain Personal Data with us, in which case we may not be able to provide to you some or all of the features and functionality of the Service.

5.5 At any time, you may object to the processing of your Personal Data, on legitimate grounds, except if otherwise permitted by Applicable Law.

5.6 In accordance with Applicable Law, we reserve the right to withhold personal data if disclosing it would adversely affect the rights and freedoms of others. Moreover, we reserve the right to charge a fee for complying with such requests if they are deemed manifestly unfounded or excessive. Amanacard may charge a reasonable administrative-cost fee if further copies are requested.

5.7 We may use your Personal Data for the purposes of automated decision-making when displaying your activity and offers based on your trends and interest. When such processing takes place, we will request your explicit consent and provide you with the option to opt-out. We may also use automated decision making in order to fulfil obligations imposed by law, in which case we will inform you of any such processing. You have the right to object to the processing of your personal data for automated purposes at any time by contacting us at [service@amanacard.com](mailto:service@amanacard.com).

## **6. HOW LONG WE KEEP YOUR DATA**

6.1 Amanacard only retains your personal information for as long as is necessary and we have strict review and retention policies in place to meet these obligations. We are required under UK tax law to keep your basic personal data (*name, address, contact details*) for a minimum of 7 years after which time, it will be destroyed. As a policy, we retain records of personal data that we collect for a period of 7 years.

6.2 Where you have consented to us using your details for direct marketing, we will keep such data until you notify us otherwise and/or withdraw your consent.

6.3 If at any time you believe that we have not adhered to this Privacy Policy, please contact us and we will seek to promptly determine and correct the problem.

## **7. ADVERTISING AND USE OF COOKIES**

7.1 We collect browser and cookie information when you first navigate to our websites. We use cookies to give you a better customer experience and for use of access. Certain cookies will allow you to leave and re-enter the Portal without re-entering your password. This will be monitored by a web server.

For more information on the use of cookies, how you can control their use, and information relating to our internet-based and mobile advertising, please refer to our cookies policy for more detail.

7.2 Cookies are text files stored, either on a temporary or persistent basis on the hard drive of your computer. Cookies are used for authenticating, session tracking and maintaining specific information about the use and users of the Portal (including user site preferences or the contents of electronic shopping carts). Cookie files may also be placed on your computer by Google Analytics for the purposes as set out in this paragraph.

7.3 The data collected by cookies is anonymous. You can delete all cookies that are already on your computer's hard drive by searching for files with "cookie" in it and deleting them. In addition, if you want to stop cookies from being stored on your computer, you can edit your browser settings so that cookies are blocked. Unfortunately, if you block cookies, you may not be able to use the full functionality of the Portal.

7.4 Web beacons consist of a small string of software code that represents a graphic image request on a Web page or email. There may or may not be a visible graphic image associated with the web beacon and often the image is designed to blend into the background of a Web page or email. Web beacons can be used for many purposes – including site traffic reporting, unique visitor counts, advertising auditing and reporting, and personalization. Web beacons used by Amanacard collect only anonymous data.

7.5 In order to improve the Portal and the Services, we use (temporary and persistent) cookies, authorised third parties' cookies, web beacons and/or other technologies to collect non-personally identifiable data. This non-personally identifiable data helps us to track browsing behaviour, to create specific or tailor-made offers or advertisements, and to monitor and record the visits and use of the Portal.

7.6 In order to understand how people use the Portal and for marketing analysis and quality improvement purposes, we (and/or third party service providers) may collect, record, process and use on an anonymous basis certain information (including the total number of transactions, viewed web pages, referring/exit pages, portal type, date/time stamp information and details like the number and location of mouse clicks on a given page, mouse movements, scrolling activity and the search words you use while being on and using the Portal.

7.7 If you register with us or if you continue to use the Portal, you agree to our use of cookies. You further agree to use the Portal only for lawful purposes.

7.8 From time to time you may find links to third party websites on the Portal. These links are provided for your information only and are not recommended by Amanacard. Amanacard has no control over the content of third party sites and accepts no responsibility or liability for them or for any loss or damage that may arise from your use of them. When accessing a third-party website, you are advised to check such website's terms of service and privacy policy to ensure compliance with applicable laws.

7.9 Our website includes Social Media Widgets or Features, such as the Facebook Like button and the Twitter button, which are interactive mini-programs that run on our site to provide specific services from another company (e.g., displaying the news, opinions, music, etc.). Personal information may be collected through the Widget, such as your email address. The Widget may also set cookies to enable it to function correctly. Information collected by this Widget is governed by the company's privacy policy that created it.

7.10 We display personal testimonials of satisfied customers on our website in addition to other endorsements, where you have agreed with a third-party review site that we may do so. If you wish to update or delete your testimonial, you can contact us at this form.

## **8. NOT PROVIDING YOUR DATA**

You are not obligated to provide your personal information to Amanacard; however, if this information is required to complete the transactions and serve you efficiently, we would not be able to offer you services without the required information.

## **9. LEGITIMATE INTERESTS**

9.1 As noted in the 'Usage of Your Personal Information By Us' section of this notice, we occasionally process your personal information under the legitimate interests' legal basis. Where this is the case, we have carried out a thorough Legitimate Interests' Assessment (LIA) to ensure that we have weighed your interests and any risk posed to you against our own interests; ensuring that they are proportionate and appropriate.

9.2 As a UK-registered Agent of money transfer / remittance businesses, Amanacard applies the principle of the legitimate interests as a basis for processing and sharing your personal data with our associate companies / branches and have identified that our interests as a business are achieved and this includes processing the personal data you submit in form of Name, Address, Email and Mobile Phone.

9.3 Where significant amounts of money are processed, we might also require further information such as verified identity documents – for example Passport, Driving license and a further Proof of Address. Based on legitimate interest grounds above, we further share your data as an applicant. We might also have to share this information during audits by third parties.

## **10. MINORS AND CHILDREN'S PRIVACY**

10.1 Protecting the privacy of minors is especially important. Our Service is not directed to children under the age of 18, and we do not knowingly collect Personal Data from children under the age of 18. If you are under 18 years of age, then please do not use or access the Service at any time or in any manner. If we learn that Personal Data has been collected on the Service from persons under 18 years of age, then we will take the appropriate steps to delete his information. If you are a parent or guardian and discover that your child under 18 years of age has obtained an Account on the Service, then you may alert us at: [service@amanacard.com](mailto:service@amanacard.com) and request that we delete your child's Personal Data from our systems.

## **11. SECURITY**

11.1 We take appropriate security measures to protect against loss, misuse and unauthorised access, alteration, disclosure, or destruction of your information. Amanacard has taken steps to ensure the

ongoing confidentiality, integrity, availability, and resilience of systems and services processing Personal Information, and will restore the availability and access to information in a timely manner in the event of a physical or technical incident.

11.2 No method of transmission over the internet, or method of electronic storage, is 100% secure. We cannot ensure or warrant the security of any information you transmit to us or store on the Service, and you do so at your own risk. We also cannot guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or organisational safeguards. If you believe your Personal Data has been compromised, please contact [service@amanacard.com](mailto:service@amanacard.com).

## **12. INFORMATION SECURITY**

12.1 The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

12.2 All information you provide to us are stored on our secured servers.

12.3 Unfortunately, the transmission of information via the internet is not completely secure. Although we take all reasonable precautions necessary to protect Personal Information from misuse, interference, loss, unauthorised access, modification or disclosure, we cannot guarantee the security of your data transmitted through our Portal; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access. We also endeavour to restrict Information access to our employees, agents and representatives that need to know it.

12.4 We transmit Personal Information using Secure Sockets Layer (SSL) software which encrypts information you input. Further, to the extent that we collect any credit card or bank account information from you, we will only reveal the last four digits of your credit card number when confirming an order. We maintain physical, electronic and procedural safeguards in connection with the collection, storage and disclosure of personally identifiable customer information. Our security procedures mean that we may occasionally request proof of identity before we disclose personal information to you.

## **13. CHANGES TO THIS PRIVACY POLICY**

13.1 Please note that this Privacy Policy may change from time to time. If we change this Privacy Policy in ways that affect how we use your Personal Information, we will advise you of the choices you may have as a result of those changes. We will also post a notice that this Privacy Policy has changed.

## **14. SPECIAL CATEGORIES DATA**

14.1 Special categories of Data as defined under GDPR include ethnic background, political opinions, religious and ideological beliefs, trade union membership, biometric and health data. Amanacard does not collect such information – we only collect the minimum amount of Data for the purposes of serving our customers.



## **Contact Information**

Questions, notices, and requests for further information should be sent to us as follows:

Huozhi Ltd

7 Bell Yard, London WC2A 2JR

WhatsApp: +44 (0) 7402 745 554

Email: [service@amanacard.com](mailto:service@amanacard.com)