

PRIVACY POLICY

EasyFy Solution OÜ

Company Registration No: 17222348

Registered Address: Harju maakond, Tallinn, Kesklinna linnaosa, Juhkentali tn 8, 10132, Estonia

Effective Date: 01/05/2025

1. Introduction

EasyFy Solution OÜ (“Company”, “we”, “our”, “us”) is committed to protecting your privacy and handling your personal data transparently, securely, and in compliance with the **General Data Protection Regulation (EU) 2016/679** (“GDPR”) and applicable Estonian laws.

This Privacy Policy explains how we collect, use, disclose, and protect your personal data when you use our platform to create, manage, promote, or register for events. It also outlines your rights and how you can exercise them.

2. Data Controller

EasyFy Solution OÜ is the **Data Controller** of the personal data collected and processed through our platform.

Contact Information:

Email: compliance@easyfysolutuin.com

3. What Data We Collect

We may collect and process the following categories of personal data:

3.1 From Event Attendees:

- Full name
- Email address
- Billing and payment details (e.g., wallet address, bank transfer data — not card numbers)
- Event registration and ticket purchase history
- Device and IP address, browser type, geolocation data
- Any feedback or messages you provide to us or to event organizers

3.2 From Event Organizers:

- Company name and legal registration information
- Authorized representative’s name and contact details
- Financial account or payout details (e.g., bank, crypto wallet, PSP account)

- Event-related content and media
- User credentials and login history

4. How We Collect Data

We collect personal data:

- Directly from users when creating an account, registering for events, or making payments
- Automatically through cookies and analytics tools when using our platform
- From third-party payment processors, banks, or crypto platforms when transactions occur
- From public sources for business verification (e.g., company registries)

5. Purpose and Legal Basis for Processing

Purpose	Legal Basis
Facilitate event registration and ticket sales	Performance of a contract
Process payments and disbursements (via banks, crypto, or PSPs)	Performance of a contract / Legitimate interest
Fraud prevention and platform security	Legitimate interest
Comply with AML, KYC, and tax obligations	Legal obligation
Customer support and communications	Legitimate interest
Marketing communications (with consent)	Consent
Improve platform functionality and user experience	Legitimate interest / Consent

6. Payment Processing

We may use various **payment service providers, financial institutions, and blockchain-based payment processors**. These may include:

- Stripe
- Licensed Estonian or EU banks
- Cryptocurrency payment gateways
- Other regulated PSPs

All sensitive payment data (e.g., card details or wallet keys) is handled **exclusively by the third-party payment provider** and never stored on our servers. We receive confirmation of payments, not the raw payment credentials.

7. Who We Share Your Data With

We may share your data with:

- **Event organizers** for ticket fulfillment and event management
- **Payment providers, banks, and crypto processors** to process transactions
- **IT and hosting providers** for platform operation
- **Legal or regulatory authorities**, when required under AML, GDPR, or taxation laws

All service providers operate under data processing agreements that ensure GDPR compliance.

8. International Data Transfers

If personal data is transferred outside the EU/EEA, we ensure appropriate safeguards are in place, such as:

- Adequacy decisions by the European Commission
- Standard Contractual Clauses (SCCs)
- Binding Corporate Rules, where applicable

9. Data Retention

Personal data is retained for as long as necessary for the purposes outlined in this policy, including:

- For event and transaction records: typically, **5 years** (to meet tax, AML, or contract requirements)
- For marketing (if consented): until consent is withdrawn
- For platform logs and analytics: up to 12 months (anonymized where possible)

10. Your Rights Under GDPR

You have the right to:

- Request access to your personal data
- Request correction of inaccurate data
- Request deletion (“right to be forgotten”)
- Restrict or object to processing
- Withdraw consent at any time
- Lodge a complaint with the Estonian Data Protection Inspectorate

To exercise your rights, contact: compliance@easyfysolution.com

11. Cookies and Analytics

Our platform uses cookies and analytics tools to improve performance, detect fraud, and tailor content.

12. Data Security

We implement technical and organizational measures, including:

- Encryption of data in transit and at rest
- Access controls and role-based permissions
- Regular audits and vulnerability scanning
- Incident response procedures

13. Changes to This Policy

We may revise this Privacy Policy at any time. The updated version will be posted on our website and effective as of the date stated. Material changes will be notified via email or in-app alerts.

Approved by:

Obner Knoener Mozarino

Title: Director

Date: 01/05/2025

Signature: _____

