

Privacy Policy

Last Updated: 16/01/2026

1. General Provisions

1.1. This Privacy Policy (“Policy”) is issued by CARDFLY PAYMENTS LTD., a company incorporated under the laws of Canada and operating under its registered name (hereinafter referred to as “CARDFLY PAYMENTS LTD.”, “we”, “us”, or “our”).

1.2. This Policy governs the collection, processing, storage, disclosure, and protection of Personal Data of individuals (“Users”, “you”, “your”) who access the website [official company website] (the “Website”), use our mobile applications, or engage with related services (collectively, the “Services”).

1.3. This Policy has been drafted in accordance with the Personal Information Protection and Electronic Documents Act (PIPEDA) of Canada, the Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) of Canada, the EU General Data Protection Regulation (GDPR), and other applicable laws and regulations relating to the protection of personal information and the prevention of financial crime.

1.4. By accessing or using our Services, you expressly acknowledge and agree to be bound by the terms of this Policy. If you do not agree, you must immediately discontinue the use of the Services.

1.5. This Policy constitutes an integral part of the User Agreement between CARDFLY PAYMENTS LTD. and the User.

1.6. Inquiries, requests, or complaints regarding this Policy shall be addressed to our Chief Technology Officer (CTO) at: email support@advasend.com

2. Categories of Personal Data Collected

CARDFLY PAYMENTS LTD. may collect, process, and retain the following categories of Personal Data:

2.1. Data Provided by the User

- Full name, residential address, email, telephone number, instant messaging or social media identifiers
- Date of birth, gender, identification number, tax residency information
- Account credentials, security preferences, authentication information
- Marketing and communication preferences

2.2. KYC and AML/ATF Data

- Government-issued identification documents (passport, identity card, driver's licence)
- Biometric identifiers (photographs, video for liveness and identity checks)
- Employment and occupation details (employer name, position, industry, and length of employment)
- Information regarding source of income and purpose of transactions
- Information relating to source of funds and/or wealth
- Screening results for Politically Exposed Persons (PEP) and international sanctions

2.3. Transactional Data

- Records of money transfers, currency exchanges, deposits, and withdrawals
- Linked financial accounts, payment cards, e-wallets, or third-party payment services
- Amount, currency, counterparties, originator/beneficiary details, transaction timestamps

2.4. Technical and Device Data

- IP address, geolocation (city-level), device specifications, operating system, browser information
- Connection data, session activity, timestamps, security event logs

2.5. Communication Data

- Emails, messages, chat transcripts, and associated attachments
- Records of telephone calls and voice recordings
- Survey responses, support interactions, and user engagement with communications

2.6. Data from Third Parties

- Information obtained from financial institutions, card schemes, credit reference agencies, and fraud prevention databases
- Data provided by regulatory authorities and compliance partners

2.7. Website and Cookie Data

- Pages visited, time spent on the Website, referral sources
- User interaction with digital marketing, campaigns, and advertisements

3. Legal Basis for Processing

The processing of Personal Data is conducted pursuant to one or more of the following legal bases:

- Consent of the User (Article 6(1)(a) GDPR; PIPEDA principles)
- Necessity for the performance of a contract with the User (Article 6(1)(b) GDPR)
- Compliance with legal and regulatory obligations, including under PCMLTFA, FATF standards, and international AML/CFT obligations (Article 6(1)(c) GDPR)
- Legitimate interests of CARDFLY PAYMENTS LTD., including but not limited to fraud prevention, risk management, service optimisation, and marketing analytics (Article 6(1)(f) GDPR)

4. Data Subject Rights

Subject to applicable law, Users shall enjoy the following rights in respect of their Personal Data:

- Right to be informed of the collection and use of Personal Data
- Right of access to obtain confirmation and a copy of the data held
- Right to rectification of inaccurate or incomplete data
- Right to erasure (“right to be forgotten”), unless retention is required by law (e.g., PCMLTFA recordkeeping)
- Right to restriction of processing under certain circumstances
- Right to data portability, in machine-readable format, where technically feasible
- Right to object to processing carried out on the basis of legitimate interests, including direct marketing
- Right to withdraw consent at any time

All rights requests shall be directed to: support@advasend.com

5. Data Retention

- KYC and AML data: retained for not less than 5 years following account closure, in accordance with PCMLTFA.
- Transactional records: retained for a period of at least 5 years.
- Marketing data: retained until withdrawal of consent.
- Other records: retained strictly for as long as is necessary to fulfil the purposes set out in this Policy.

6. Security Measures

CARDFLY PAYMENTS LTD. employs appropriate organisational and technical safeguards, including but not limited to:

- Encryption of data in transit and at rest
- Multi-factor authentication (MFA) for user accounts and administrative systems
- Restricted physical and logical access to infrastructure and offices
- Regular penetration testing, audits, and monitoring
- Confidentiality agreements with employees, contractors, and service providers

7. Disclosure to Third Parties

CARDFLY PAYMENTS LTD. does not sell or lease Personal Data. Personal Data may, however, be disclosed under strict confidentiality and data protection terms to:

- Financial institutions and payment providers for the purpose of executing transactions
- Vendors of KYC, AML, and sanctions screening services
- Supervisory and regulatory authorities, as well as law enforcement, where legally required
- Technology and infrastructure partners (e.g., cloud hosting, analytics, CRM platforms)

8. International Transfers

Personal Data may be transferred to jurisdictions outside Canada, including but not limited to the European Union and the United Kingdom.

Where required by law, such transfers shall be carried out subject to adequacy decisions, Standard Contractual Clauses (SCCs), or equivalent safeguards.

9. Cookies and Tracking Technologies

CARDFLY PAYMENTS LTD. uses the following categories of cookies:

- Functional cookies to enable log-in sessions and preferences
- Analytical cookies (e.g. Google Analytics) for statistical reporting
- Advertising cookies (e.g. Facebook Pixel, Google Ads, LinkedIn Ads) for marketing and retargeting purposes

Users may configure their browser to reject or disable cookies, although this may impact functionality of the Services.

10. Account Deletion

10.1. Users may request deletion of their accounts following the completion of all pending transactions.

10.2. Certain records, including KYC and AML data, must be retained by law for a minimum of five (5) years and cannot be deleted on request.

10.3. Where records are relevant to a dispute, investigation, or regulatory process, they shall be retained until the resolution of such matter.

11. Amendments

CARDFLY PAYMENTS LTD. may amend or update this Policy at any time. Notice of amendments shall be published on the Website, including an updated “Last Updated” date. Continued use of the Services following the publication of an updated Policy shall constitute acceptance of the revised terms.

12. Contact Information

For all matters arising under this Policy, including the exercise of statutory rights, Users may contact:

Chief Technology Officer (CTO) support@advasend.com