

Privacy and Cookie Policy

Effective date:

1. General Provisions

This Privacy and Cookie Policy describes what personal data is processed by Comity Finance, for what purposes, on what legal bases, and in what manner, as well as the User's rights under the EU General Data Protection Regulation (GDPR).

Comity Finance acts as the data controller with respect to personal data required for operating the Service and interacting with licensed Electronic Money Institutions (EMIs).

2. Data Controller

The controller of personal data is: Comity Finance OÜ (Estonia) — regarding the data required for the operation of the Service, API interaction with EMI and user support.

Contacts for inquiries: support@comity.fi

EMI providers act as independent controllers in relation to data related to:

- KYC/AML;
- by issuing the card and account;
- financial transactions;
- regulatory reporting.

3. Processed Data

3.1. Comity Finance processes only the minimum necessary data provided by platform Comity, including:

- email;
- user_id;
- KYC status (without documents, images, or biometrics).

3.2. Data provided by the EMI (displayed only in the interface)

- card details;
- payment account details;
- transaction statuses;
- transaction history.

Comity Finance does not modify, alter, or control any financial data provided by the EMI.

3.3. Technical data

- IP address;
- cookies;
- device information;
- technical event logs;
- service usage information.

4. Purposes of Data Processing

Personal data is used for the following purposes:

- providing the User with access to the Comity Finance Service;
- transmitting technical requests to the EMI (card issuance, payout initiation, retrieval of payment details, etc.);
- displaying EMI-provided information within the Comity Finance interface;
- ensuring security and preventing fraud;
- complying with EMI requirements and regulatory obligations;
- providing technical support to the User;
- improving the performance and functionality of the Service.

5. Legal Bases for Processing (GDPR Art. 6)

- 5.1. Performance of a contract (Art. 6(1)(b)) — providing Service functionality.
- 5.2. Legitimate interest (Art. 6(1)(f)) — ensuring stability, security, and integrity of the Service.
- 5.3. Legal obligation (Art. 6(1)(c)) — fulfilling EMI and EU regulatory requirements.
- 5.4. User consent (Art. 6(1)(a)) — transferring data to the EMI, use of cookies where necessary.

6. Data Sharing with Third Parties

Data may be shared with:

- 6.1. EMI providers, for the purposes of:
 - card issuance,
 - executing transactions,
 - AML/KYC checks,
 - fulfilling regulatory requirements.

- 6.2. Platform Comity, regarding limited technical statuses (if provided for by functionality and User consent).
- 6.3. Infrastructure providers:
 - hosting providers;
 - technical support providers;
 - analytics services (functional and GDPR-compliant only).
- 6.4. EU regulatory authorities, only where a legal obligation exists.
- 6.5. All data sharing is strictly limited by the principle of data minimisation.

7. International Data Transfers

Data may be transferred outside the European Union only where adequate GDPR safeguards are in place, including:

- Standard Contractual Clauses (SCCs);
- adequacy decisions issued by the European Commission;
- other mechanisms permitted by GDPR.

8. User Rights (GDPR). The User has the right to:

- receive confirmation whether their data is being processed;
- obtain a copy of their data (right of access);
- rectify inaccurate data;
- request deletion of data (“right to be forgotten”), except data required under AML regulations;
- restrict processing;
- receive their data in a structured, commonly used, machine-readable format (data portability);
- withdraw consent at any time (without affecting the lawfulness of processing before withdrawal);
- lodge a complaint with the supervisory authority (Estonian Data Protection Inspectorate).

Requests may be submitted via the Comity Finance contact channels.

9. Data Retention

Personal data is retained:

- for at least 5 years after the User stops using the Service — where required by law or EMI obligations (AML standard);

- longer if mandated by regulators or necessary to protect the rights of Comity Finance.

Technical data may be stored for shorter periods, in accordance with internal data retention rules.

10. Cookies

Comity Finance uses the following categories of cookies:

- functional cookies — required for the proper operation of the Service;
- analytics cookies — used to analyze Service performance (anonymized).

Use of non-essential cookies requires explicit User consent.

11. Updates and Amendments

- 11.1. Comity Finance may update this Privacy and Cookie Policy unilaterally if changes are required due to:
 - updates to Service functionality;
 - changes in legal requirements;
 - modifications in data processing procedures;
 - requirements of EMI providers or regulators;
 - introduction of new technologies or security measures.
- 11.2. An updated version of the Policy is published in the Service no later than 7 (seven) calendar days before it enters into force, except where:
 - immediate changes are required by legislation or regulators;
 - changes are minor and do not affect User rights (editorial corrections, clarifications, formatting adjustments).
- 11.3. Continued use of the Service after the updated Policy comes into effect constitutes the User's acceptance of the revised Policy.
- 11.4. If the User does not agree with the changes, they must stop using the Service and close their account (if applicable) before the changes take effect.
- 11.5. Comity Finance notifies the User of changes where such notification is required by applicable law, GDPR, or EMI obligations.

12. Contact Information

Comity Finance OÜ

Estonia

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