

PRIVACY POLICY

Information on the Processing of Your Personal Data

Last updated: 15.10.2026

Ensuring the highest level of privacy protection for our customers is a priority for us. We strive to apply the highest data security standards and to meet all legal requirements in this area.

Below, we have prepared the most important information on how we process your personal data. Please read all the details provided on this page carefully.

01 Everything you need to know about the Data Controller

We, **Venturox S.à r.l.**, 2, rue Sigg yu Lëtzebuerg, L-1933 Luxembourg, registered with the Luxembourg Trade and Companies Register (RCS) under number B 311762, are the Controller of your personal data.

How to contact us

Email: privacy@payeye.com

02 Where may we have obtained your personal data from?

We may have received your personal data directly from you (if you have contacted us directly or visited our website).

If you represent one of our customers or business partners, we may have received your data from the organisation you represent. In such a case, these are usually your business contact details (e.g. first name, surname, position, business email address and telephone number).

03 What categories of personal data do we process?

Depending on the context of our contact or cooperation, we may process the following categories of personal data:

- identification and contact data – e.g. first name, surname, email address, telephone number;
- professional data – e.g. the name of the organisation you represent and your position (if you represent our customer or business partner);
- the content of correspondence and other communications with us;
- data relating to complaints, requests or claims – if you are a party to such proceedings;
- online identifiers and data on your use of our website – e.g. IP address, device and browser information, cookie identifiers (to the extent described in our Cookie Policy).

Providing your personal data is voluntary. However, if you do not provide it, we may be unable to respond to your enquiry or to maintain business contact with you.

04 For what purposes and on what legal basis do we process your data?

Depending on how we obtained your data and on the context of our cooperation and/or contact, we will process your data for the following purposes:

Purpose of processing	Legal basis for processing
Analytical and/or marketing purposes – collecting data and information about users of our websites and presenting marketing content, based on cookies. The sole purpose of this processing is to improve the functionality of our websites and/or to carry out marketing activities.	The legal basis for processing data collected through this type of cookies is your voluntary consent – Art. 6(1)(a) GDPR, in conjunction with Art. 4(3)(e) of the amended Luxembourg Law of 30 May 2005 on the protection of privacy in the electronic communications sector.
Ensuring the proper functioning of the website by placing certain cookies which ensure, among other things, its security and the operation of specific website parameters.	Our legitimate interest (Art. 6(1)(f) GDPR) in ensuring the security and proper technical operation of our website. Under Art. 4(3)(e) of the amended Law of 30 May 2005, such strictly necessary (essential) cookies do not require your consent.
Performance of the agreement between the organisation you represent and us, as well as ensuring the necessary contact and maintaining business relations – if you represent our customer or business partner.	Our legitimate interest (Art. 6(1)(f) GDPR) in performing agreements concluded with our customers and business partners and in maintaining business relations with them.
Responding to you – if you have contacted us (e.g. by telephone or email).	Our legitimate interest (Art. 6(1)(f) GDPR) in responding to enquiries and communicating with persons who contact us.
Handling any complaints or requests, as well as establishing, pursuing and defending against claims – if you are a party to such proceedings or they concern you in any way.	Our legitimate interest (Art. 6(1)(f) GDPR) in handling complaints and requests and in establishing, exercising or defending legal claims.
Handling requests concerning the exercise of your data protection rights and fulfilling other obligations imposed on us by law.	Compliance with our legal obligations – Art. 6(1)(c) GDPR, in conjunction with Arts. 12–22 GDPR and other applicable laws.

More information on our use of cookies is available here: https://payeye.com/wp-content/uploads/2026/10/cookie_policy_payeye.pdf

05 Who may we share your personal data with?

We use the support of professional third parties; therefore, the recipients of your personal data will be entities processing personal data on our behalf. This applies, for example, to providers of services or technical support – such as hosting and IT service providers, providers of analytics and marketing tools, and providers of email and communication services. These entities may process your personal data only to the extent necessary to perform the tasks entrusted to them, on the basis of agreements concluded with us.

Where necessary, we may also share your data with our professional advisers (e.g. legal advisers and auditors), who are bound by confidentiality obligations. We may also disclose your data to institutions authorised by law – such as law enforcement authorities.

06 May your personal data be transferred outside the European Economic Area?

We want to ensure the highest quality and the highest level of security of our services. That is why we use other providers, e.g. for IT support.

As a result, your personal data may be transferred outside the European Economic Area (EEA). However, we assure you that in such a case the transfer will take place on the basis of an appropriate agreement between us and the relevant entity containing standard contractual clauses drawn up and approved by the European Commission (Art. 46(2)(c) GDPR), or on the basis of a relevant decision of the European Commission (adequacy decision – Art. 45 GDPR) confirming an adequate level of data protection in the country concerned. You can obtain a copy of the safeguards applied (e.g. the standard contractual clauses) by contacting us at privacy@payeye.com.

07 How long will we process your personal data?

How long we process your data depends directly on the purpose of the processing; therefore:

- data processed on the basis of our legitimate interest will be processed until you have effectively objected or until that interest ceases to exist; for example, data processed for the purpose of pursuing or defending against claims will be processed for the limitation period applicable to such claims under the applicable law;
- data processed on the basis of your consent will be processed until you withdraw it;
- data processed in order to comply with our legal obligations will be processed for the period required by the relevant legal provisions.

Once the relevant retention period has expired, your data will be deleted or anonymised.

08 What rights do you have in connection with the processing of your personal data?

In connection with our processing of your personal data, you have the following rights:

- the right to request access to your personal data, including obtaining a copy of it;
- the right to request rectification of your personal data;
- the right to request erasure of your personal data (only where we are not required by law to continue processing it);
- the right to request restriction of the processing of your personal data;
- the right to data portability, i.e. the right to receive your personal data from us in a structured, commonly used and machine-readable format. You may transmit this data to another controller or request that we transmit your data to another controller. However, we will do so only where such a transmission is technically feasible (this right applies to data processed by automated means on the basis of your consent or a contract);

- where the legal basis for processing is the legitimate interest of the Controller – the right to object at any time to the processing of your personal data on grounds relating to your particular situation.

Where your data is processed on the basis of consent, you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing carried out before its withdrawal. The easiest way to do this is by setting your preferences in the cookie banner or in your browser settings – more information can be found in our Cookie Policy https://payeye.com/wp-content/uploads/2026/10/cookie_policy_payeye.odt

Right to lodge a complaint

You also have the right to lodge a complaint with a supervisory authority – in particular with the Luxembourg National Commission for Data Protection (Commission nationale pour la protection des données – CNPD), 15, Boulevard du Jazz, L-4370 Belvaux, Luxembourg, tel. (+352) 26 10 60-1, website: cnpd.public.lu (where an online complaint form is available).

You may also lodge a complaint with the supervisory authority of the EU/EEA Member State of your habitual residence, your place of work or the place of the alleged infringement.

Requests to exercise your rights may be submitted using the contact details provided at the beginning of this document.

We will respond to your request without undue delay and in any event within one month of receiving it. Where necessary, taking into account the complexity and number of requests, this period may be extended by a further two months – in which case we will inform you of the extension and the reasons for it. Exercising your rights is free of charge. If we have reasonable doubts as to your identity, we may ask you to provide additional information necessary to confirm it.

09 Automated decision-making

We do not make decisions based solely on automated processing of your personal data, including profiling, which would produce legal effects concerning you or similarly significantly affect you.

10 Changes to this Privacy Policy

We may update this Privacy Policy, in particular in the event of changes in the law or in the way we process personal data. The current version is always available on our website, and the date of the last update is indicated at the top of this document.