

PRIVACY POLICY

Last update: July 29, 2023

1. Introduction

In accordance with applicable data protection laws and GDPR regulations, Daxil provides its customers (including prospective customers), their authorized representatives, and other related parties ("Data Subjects") with information regarding the processing of personal data.

This Privacy Policy applies to the use of services provided via <https://daxil.com>.

2. Who We Are

Daxil

A service platform providing financial and payment services via Internet-based technologies, including business accounts, payment processing, transfers, and related services.

Data Controller:

LLC All Pay Way

Registration number: 400147211

Address: Georgia, Tbilisi, 46 Vazha-Pshavela Avenue

Email: support@daxil.com

3. How We Collect Personal Data

We collect data:

- directly from the Data Subject (via website, applications, communication channels)
- from authorized third parties (e.g. business partners, service providers)
- from publicly available sources (registers, official databases, etc.)

4. What Data We Process

Personal Data

- Identification data (passport, ID, etc.)
- Contact data (email, phone)
- Address
- Photo / video (for verification)
- Device and technical data (IP, OS, identifiers)

We do not intentionally collect sensitive personal data (e.g. political views, health data, etc.)

5. Cookies

We use cookies to:

- ensure platform functionality
- improve user experience
- analyze usage

Cookies may collect:

- device data
- session data
- usage behavior

6. Purpose of Data Processing

We process data for:

- onboarding and account management
- providing business wallet and payment services
- processing transactions
- customer support
- fraud prevention and risk monitoring
- compliance with AML/CFT and legal obligations

7. KYC / KYB Verification

To comply with regulatory requirements, we perform identity verification.

We use third-party providers to:

- verify identity documents
- perform biometric verification
- conduct compliance and risk checks

Data may be shared with such providers strictly for compliance purposes.

8. Data Sharing

We may share data with:

- banks and payment institutions
- KYC/KYB providers
- regulators and authorities
- service providers and contractors

Personal data is never sold.

9. Data Processing Methods

Data is processed:

- electronically and manually
- with appropriate security measures
- to ensure confidentiality, integrity, and availability

10. Data Retention

Data is retained:

- as long as necessary for service provision
- as required by law (including AML obligations)

11. Fraud Prevention

We use automated systems to:

- monitor transactions
- detect suspicious activity
- prevent fraud

This may include automated decision-making.

12. Data Subject Rights

You have the right to:

- access your data
- correct inaccuracies
- request deletion
- restrict processing
- object to processing
- withdraw consent

13. Regulatory Disclosure

We may disclose data to:

- regulatory authorities
- law enforcement
- courts

when required by law.

14. Third-Party Services

We may use:

- Google Analytics
- Meta Pixel

These services process data according to their own privacy policies.