SmartPayz Privacy Policy

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1. Introduction

Tech Mode Limited (“SmartPayz,” “we,” “us,” or “our”) provides a payments operations platform and related services through the website located at www.smartpayz.com (the “Site”). This Privacy Policy explains how we collect, use, disclose, and safeguard information when you visit the Site, interact with our marketing materials, or otherwise engage with us online.

This Policy applies to visitors, prospective customers, and business contacts who interact with the Site. It does not cover information processed within the SmartPayz platform itself once a customer agreement is in place; that processing is governed by the applicable [Master Services Agreement / Data Processing Agreement] between SmartPayz and its customers.

By using the Site, you acknowledge that you have read and understood this Policy. If you do not agree with our practices, please do not use the Site.

2. Scope and Applicable Law

SmartPayz operates internationally and aims to apply consistent privacy practices across jurisdictions. Depending on your location, additional rights and obligations may apply, including but not limited to:

- The General Data Protection Regulation (GDPR) and UK GDPR, for individuals in the European Economic Area and United Kingdom.
- The California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), and other emerging U.S. state privacy laws, for individuals in those states.
- Other applicable national or regional data protection laws in the countries where we operate or where our visitors are located.

Where local law provides greater protection or additional rights than described generally in this Policy, that local law governs and supplements the provisions below.

3. Information We Collect

3.1 Information You Provide Directly

We collect information you choose to share with us, such as when you fill out a contact or demo-request form, subscribe to updates, register for a webinar, or otherwise communicate with our team. This may include:

- Full name
- Business email address and phone number
- Company name, job title, and industry

- Country or region
- Any other information you choose to include in messages, forms, or survey responses

We do not knowingly collect payment card numbers, bank account credentials, or other sensitive financial account data through the Site itself. Such information is processed exclusively through the secure SmartPayz platform under separate contractual terms with our customers.

3.2 Information Collected Automatically

When you visit the Site, we and our service providers automatically collect certain technical and usage information through cookies, pixels, software development kits (SDKs), and similar tracking technologies, including:

- IP address and approximate geographic location
- Browser type, device type, and operating system
- Pages viewed, time spent on pages, links clicked, and referring/exit URLs
- Date and time of access, and general usage patterns

This information is generally aggregated or pseudonymized for analytics purposes. See Section 5 (Cookies and Similar Technologies) for further detail and your choices.

3.3 Information from Other Sources

We may supplement the information above with information from third parties, such as business contact data providers, marketing partners, or publicly available professional profiles, where permitted by applicable law.

4. How We Use Your Information

We use the information described above for the following purposes:

- To respond to inquiries, provide requested information, and communicate about our products and services
- To operate, maintain, and improve the Site, including troubleshooting and security monitoring
- To analyze usage trends and measure the effectiveness of our content and marketing campaigns
- To send marketing communications, where you have consented or where otherwise permitted by law, and always with an option to opt out
- To comply with legal obligations, enforce our terms, and protect the rights, property, or safety of SmartPayz, our users, and others
- For any other purpose disclosed to you at the time the information was collected, or with your consent

5. Cookies and Similar Tracking Technologies

The Site uses cookies and similar technologies to operate effectively and to understand how visitors engage with our content. Categories of cookies used may include:

- Essential/Strictly Necessary Cookies – required for core Site functionality, such as security and load balancing. These cannot be disabled through our cookie tool.
- Analytics/Performance Cookies – help us understand how visitors use the Site (e.g., page views, session duration) so we can improve content and navigation.
- Functionality Cookies – remember choices you make (such as language or region) to provide a more personalized experience.
- Advertising/Targeting Cookies – used, where applicable, to deliver and measure the relevance of marketing communications across platforms such as LinkedIn.

Where required by law, we will request your consent before placing non-essential cookies and will provide a cookie management tool allowing you to accept, reject, or customize categories of cookies. You can also control cookies through your browser settings; note that blocking certain cookies may affect Site functionality.

6. Legal Bases for Processing (EEA/UK Visitors)

Where the GDPR or UK GDPR applies, we rely on the following legal bases to process personal data:

- Consent – for example, when you opt in to receive marketing communications or accept non-essential cookies.
- Legitimate Interests – for example, to maintain Site security, understand usage patterns, and improve our offering, balanced against your rights and interests.
- Performance of a Contract – where processing is necessary to respond to your request or provide information you have asked for.
- Legal Obligation – where we must retain or disclose information to comply with applicable law.

You may withdraw consent at any time where consent is the basis for processing, without affecting the lawfulness of processing carried out before withdrawal.

7. How We Share Your Information

We do not sell personal information collected through the Site for monetary consideration. We may share information with the following categories of recipients:

- Service Providers – vendors who perform services on our behalf, such as website hosting, analytics, email delivery, customer relationship management, and advertising platforms, under contractual confidentiality and data protection obligations.

- Affiliates and Group Companies – for internal administrative purposes consistent with this Policy.
- Professional Advisors – such as auditors, lawyers, and consultants, where necessary for their services.
- Business Transfers – in connection with a merger, acquisition, financing, or sale of assets, subject to standard confidentiality arrangements.
- Legal and Regulatory Authorities – where required to comply with applicable law, legal process, or to protect the rights, safety, or property of SmartPayz or others.

8. International Data Transfers

As SmartPayz operates across multiple jurisdictions, information collected through the Site may be transferred to, stored, and processed in countries other than your country of residence, including countries that may have different data protection laws. Where we transfer personal data from the EEA, UK, or Switzerland to a country not deemed to provide an adequate level of protection, we rely on appropriate safeguards, such as the European Commission's Standard Contractual Clauses or the UK International Data Transfer Addendum, or another lawful transfer mechanism.

9. Data Retention

We retain personal information collected through the Site only for as long as necessary to fulfill the purposes outlined in this Policy, including to satisfy any legal, accounting, or reporting obligations. Criteria used to determine retention periods include the nature of the information, the purpose of processing, and applicable statutory retention requirements. [Insert specific retention periods or retention schedule reference, if available.]

10. Your Privacy Rights

10.1 General Rights

Depending on your location, you may have some or all of the following rights regarding your personal information:

- Access – request confirmation of, and access to, the personal information we hold about you
- Correction – request correction of inaccurate or incomplete information
- Deletion – request deletion of personal information, subject to certain exceptions
- Restriction or Objection – request that we restrict or stop certain processing, including objecting to processing based on legitimate interests or for direct marketing
- Portability – request a copy of certain information in a structured, commonly used, machine-readable format

- Withdraw Consent – where processing is based on consent, withdraw that consent at any time

10.2 EEA/UK Residents

If you are located in the EEA or UK, you have the rights described above under the GDPR/UK GDPR, and you have the right to lodge a complaint with your local data protection supervisory authority if you believe our processing of your personal data violates applicable law.

10.3 California and Other U.S. State Residents

If you are a California resident, the CCPA/CPRA grants you the right to know what personal information we collect, the right to request deletion, the right to correct inaccurate information, and the right to non-discrimination for exercising your privacy rights. We do not sell or share personal information for cross-context behavioral advertising as those terms are defined under the CCPA/CPRA, except [describe advertising-cookie practices, e.g., LinkedIn/analytics pixels, if applicable – update if this constitutes a “share” under CPRA]. Residents of other U.S. states with comprehensive privacy laws (e.g., Virginia, Colorado, Connecticut) may have similar rights under their respective state laws.

10.4 How to Exercise Your Rights

You may exercise your rights by contacting us using the details in Section 14 (Contact Us). We may need to verify your identity before responding to your request. We will respond within the timeframe required by applicable law.

11. Data Security

We implement appropriate technical and organizational measures designed to protect personal information against unauthorized access, alteration, disclosure, or destruction, including [describe measures, e.g., encryption in transit, access controls, regular security assessments]. However, no method of transmission or storage is completely secure, and we cannot guarantee absolute security.

12. Children's Privacy

The Site is intended for business audiences and is not directed to children. We do not knowingly collect personal information from individuals under the age of 18. If we become aware that we have inadvertently collected such information, we will take steps to delete it promptly.

13. Third-Party Websites and Links

The Site may contain links to third-party websites or services not operated or controlled by SmartPayz. This Policy does not apply to those third-party sites, and we encourage you to review their privacy policies before providing any information.

14. Changes to This Privacy Policy

We may update this Policy from time to time to reflect changes in our practices, technology, legal requirements, or other factors. We will post the revised Policy on this page with an updated effective date, and, where required by law, will provide additional notice or seek consent for material changes.

15. Contact Us

If you have questions, concerns, or requests regarding this Privacy Policy or our data practices, please contact us at:

- Tech Mode Limited
- 66 Vitosha Blvd., Sofia, Bulgaria
- Email: hello@smartpayz.com