

MOVERE PRIVACY POLICY

Effective Date: 01 September 2026

1. Introduction

This Privacy Policy explains how Mooov3 Ltd, trading as Movere ("Movere", "we", "us", or "our"), collects, uses, stores, shares, and protects personal data in connection with its payment orchestration, merchant enablement, and financial technology services.

Movere is a payment orchestration and infrastructure platform that enables merchants, platforms, and partners to connect with payment service providers, financial institutions, and payment methods through a unified integration layer.

We are committed to handling personal data responsibly and in compliance with the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018, and other applicable data protection laws.

Registered entity: Mooov3 Ltd | Registered address: 10-12 Love Lane, London, HA5 3EF, United Kingdom | Privacy contact: privacy@movere.money

2. Who This Policy Applies To

This Privacy Policy applies to personal data processed in connection with the following categories of individuals:

- Merchants, platform clients, and their authorised personnel;
- End users who interact with merchants or platforms that use Movere services;
- Business partners, suppliers, and service providers;
- Visitors to Movere-operated websites; and
- Any other individual whose personal data is processed in connection with Movere services.

3. Our Role: Controller and Processor

The nature of Movere's data protection obligations depends on context:

3.1 Where Movere acts as a Data Controller

Movere is the data controller in relation to personal data it collects and processes for its own purposes, including but not limited to:

- Merchant and partner onboarding and relationship management;
- Operating and maintaining the platform;
- Fraud prevention, platform security, compliance activities, and legal or regulatory obligations that apply to Movere; and
- Website visitor data and internal business operations.

3.2 Where Movere acts as a Data Processor

When Movere processes personal data on behalf of a merchant or platform client (for example, transaction data relating to end users), it does so as a data processor, acting on the instructions of the merchant or platform client (who is the data controller). In these circumstances, processing is governed by the applicable data processing agreement between the parties.

Merchants and platform clients are responsible for ensuring they have a lawful basis and appropriate notices in place for their own processing of personal data, including data processed via Movere's services.

4. Personal Data We Collect

Depending on the services and context, we may collect and process the following categories of personal data:

4.1 Merchant and partner data

- Identity information: name, company name, job title, director and beneficial owner information;
- Contact information: email address, phone number, business address;
- KYB/KYC information: where applicable to the services provided, identity verification documents, company registration details, and beneficial ownership information, including information collected to facilitate onboarding with payment or verification partners;
- Financial information: where applicable, bank account or settlement-related information required to facilitate services with payment partners; and
- Compliance and risk-related information.

4.2 End user data (processed as processor)

- Transaction metadata and payment-related information;
- Tokenised payment credentials (no raw card data is stored by Movere); and
- Fraud signals and risk-scoring data.

4.3 Technical and usage data

- Device, browser, and operating system information;
- IP addresses and geolocation data;
- API and integration activity logs; and
- Communications and support interactions.

Movere does not intentionally collect special category personal data (such as health data, biometric data, or data revealing racial or ethnic origin) unless specifically required for regulatory, compliance, or fraud prevention purposes, in which case we will identify and rely on an appropriate legal basis.

4.4 Sources of Personal Data

We may collect personal data directly from you, or receive it from merchants, platform clients, payment providers, identity verification and compliance providers, business partners, and publicly available sources, where permitted by law.

4.5 Automated Processing and Profiling

Movere may use automated tools to support fraud prevention, security, transaction monitoring, and risk assessment. Movere does not currently make solely automated decisions about individuals that produce legal or similarly significant effects. Where this changes, we will provide the information and safeguards required by applicable data protection law.

5. Payment Data and PCI DSS

Movere operates a secure payment technology and orchestration platform that facilitates the routing and management of payment transactions between merchants and third-party payment providers. Movere's technology is designed with security controls and tokenisation to protect payment data and minimise exposure to sensitive cardholder information. Movere does not store raw card numbers (PANs). Our technology environment is designed to support PCI DSS compliance, with formal validation progressing as the platform scales.

Movere does not act as a bank, card issuer, or acquiring institution. Regulated payment activities, including acquiring, settlement, and card issuing where applicable, are performed by appropriately regulated third-party payment providers, which are responsible for maintaining their own applicable regulatory, PCI DSS, and security requirements.

6. How We Use Personal Data

We process personal data for the following purposes, each supported by a lawful basis under UK GDPR (see Section 7) and anonymised where required:

- Providing, operating, and improving the Movere platform and services;
 - Payment orchestration and transaction routing, and facilitating settlement through relevant payment partners;
 - Merchant and partner onboarding and relationship management, including facilitating verification by relevant payment or verification partners where applicable;
 - Fraud prevention, transaction monitoring, and platform security;
 - Compliance with legal, regulatory, tax, financial crime, and anti-money laundering requirements where they apply to Movere, and supporting regulated payment partners with their compliance processes where appropriate;
 - Responding to customer support and communications;
 - Analytics, performance monitoring, and product development;
 - Enforcing our contractual and platform policies; and
 - Communicating service updates, notices, and, where consented, marketing.
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7. Lawful Basis for Processing

Under UK GDPR, we rely on the following lawful bases:

- Contract: processing is necessary to perform our agreement with merchants, partners, and (where applicable) end users;

- Legal obligation: processing is required to comply with legal and regulatory requirements that apply to Movere, which may include data protection, financial crime prevention, tax, record-keeping, and other applicable obligations;
- Legitimate interests: processing is necessary for our legitimate interests (such as fraud prevention, platform security, product improvement, and business development), where those interests are not overridden by the rights and interests of the individuals concerned;
- Consent: where we rely on consent (for example, for certain marketing communications), we will obtain it clearly and it may be withdrawn at any time; and
- Vital interests or public task: in limited circumstances where relevant.

8. Data Sharing

Movere may share personal data with the following categories of recipients, where necessary and proportionate for the provision of services or in compliance with all applicable laws and regulations:

- Payment processors, acquiring banks, regulated payment providers, and financial institutions, to facilitate transaction routing, payment services, and settlement;
- Identity verification and KYB/KYC providers, where required to support onboarding or services delivered with payment partners;
- Fraud prevention, risk management, and compliance solution providers;
- Cloud infrastructure, hosting, and technology service providers;
- Professional advisers, including legal, accounting, and audit firms (subject to confidentiality obligations);
- Regulatory authorities, law enforcement, and courts, where required by law or legal process; and
- Successor entities in the event of a merger, acquisition, or business restructuring.

We do not sell personal data to third parties. All third-party processors are required to process data only on our documented instructions and to maintain appropriate security measures.

9. International Data Transfers

As a global payment orchestration platform, personal data may be transferred to, and processed in, countries outside the United Kingdom. Where such transfers occur, we implement appropriate safeguards to ensure the data remains protected to the standard required by UK data protection law, including:

- Transfers to countries with a UK adequacy decision (i.e., countries deemed to provide an equivalent level of data protection);
- Use of UK International Data Transfer Agreements (IDTAs) or, where applicable, the EU Standard Contractual Clauses with the UK addendum, with third-party recipients; and
- Binding corporate rules or other approved transfer mechanisms where applicable.

Details of the transfer mechanism applicable to a specific processing activity are available on request by contacting privacy@movere.money.

10. Data Retention

We retain personal data only for as long as necessary for the purposes for which it was collected, taking into account applicable legal, regulatory, tax, accounting, security, and dispute resolution requirements. Typical retention periods may include:

- Transaction records and KYB/KYC documentation held by Movere: typically up to 7 years from the end of the relevant business relationship, where required or appropriate, or longer where required by applicable law or ongoing proceedings;
- Account and relationship data: typically for the duration of the business relationship and, where appropriate, up to 7 years afterwards;
- Technical logs and API activity: up to 12 months unless longer retention is required for security or legal purposes;
- Website visitor and cookie data: in accordance with our Cookie Policy (typically up to 12 months); and
- Support and communications: up to 3 years following the close of the relevant matter.

Where personal data is no longer required, it is securely deleted or anonymised in accordance with our data retention schedule.

11. Security

Movere implements appropriate technical and organisational measures to protect personal data against unauthorised access, loss, destruction, or disclosure. These measures include:

- Encryption of data in transit (TLS) and at rest;
- Tokenisation of payment credentials;
- Role-based access controls and multi-factor authentication;
- Continuous security monitoring and audit logging;
- Security controls designed to support applicable PCI DSS requirements across the relevant payment technology environment;
- Vendor due diligence and sub-processor oversight; and
- Incident response and data breach management procedures.

No technical or organisational security measure can guarantee absolute security. In the event of a personal data breach that is likely to result in a risk to the rights and freedoms of individuals, we will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware, and will notify affected individuals where required.

12. Your Rights

Subject to applicable law and where Movere is acting as a data controller, individuals have the following rights in relation to their personal data:

- Right of access: to obtain a copy of your personal data and information about how it is processed;
- Right to rectification: to have inaccurate or incomplete personal data corrected;
- Right to erasure: to request deletion of your personal data in certain circumstances;

- Right to restriction: to restrict the processing of your personal data in certain circumstances;
- Right to data portability: to receive your personal data in a structured, commonly used format and to transmit it to another controller;
- Right to object: to object to processing based on legitimate interests or for direct marketing purposes; and
- Right to withdraw consent: where processing is based on consent, to withdraw that consent at any time without affecting the lawfulness of prior processing.

Requests should be submitted to privacy@movere.money. We will respond within one month of receipt, subject to any legally permitted extensions. We may need to verify your identity before processing a request.

Where you consider our processing of your personal data to be unlawful, you have the right to lodge a complaint with the Information Commissioner's Office (ICO) at ico.org.uk, or the relevant supervisory authority in your jurisdiction.

13. Cookies and Tracking Technologies

Movere websites and services use cookies and similar tracking technologies. These may be used for:

- Essential functionality: to enable core features of the website and platform (these cannot be disabled);
- Security: to detect and prevent fraud and unauthorised access;
- Analytics: to understand how visitors interact with our website and to improve performance; and
- Preferences: to remember your settings and personalise your experience.

Where non-essential cookies are used, we will seek your consent. You may manage cookie preferences through our cookie consent tool or your browser settings. Disabling certain cookies may affect the functionality of our services.

14. Third-Party Links and Services

Our platform and website may contain links to, or integrations with, third-party services and platforms. Movere is not responsible for the privacy practices of third parties. We encourage you to review the privacy policies of any third-party services you access through or in connection with Movere.

15. Children's Data

Movere's services are not directed at individuals under the age of 18. We do not knowingly collect or process personal data relating to children. If we become aware that personal data of a child has been collected, we will take steps to delete it promptly. If you believe we have inadvertently collected such data, please contact privacy@movere.money.

16. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our services, legal obligations, or operational practices. Where changes are material, we will notify affected parties through appropriate channels (such as email or a notice on our website) before the changes take effect. The current version will always be available at movere.money. The effective date at the top of this document indicates when this version was last updated.

17. Governing Law and Contact

This Privacy Policy is governed by the laws of England and Wales. Any disputes arising in connection with it shall be subject to the exclusive jurisdiction of the courts of England and Wales.

For any questions, concerns, or requests relating to this Privacy Policy or our data processing practices, please contact:

Privacy Team, Mooov3 Ltd
10-12 Love Lane, London, HA5 3EF, United Kingdom
privacy@movere.money