

Privacy Policy of Butler Pay

Last updated:[25.08.2026]

This Privacy Policy ("Policy") governs the collection, use, storage, disclosure, and protection of personal data of individuals processed while using the website and Solutions butlerpay.net, butlerpay.app (hereinafter — "Company", "we", "us", "Service", "Solution").

1. General Provisions

1.1. This Policy applies to all Users, regardless of their location, when using the Solution, including the website, mobile applications, APIs, referral programs, and other platforms administered by the Company.

1.2. By using the Solution, you confirm that you have read, understood, and agreed to the processing of your personal data in accordance with this Policy.

1.3. If you do not agree with the terms of this Policy, you must stop using the Solution.

2. Contact Information

Websites: <https://butlerpay.app>, <https://butlerpay.net>

Email: support@butlerpay.net

You may send inquiries, requests, or complaints regarding the processing of personal data to the specified email address.

3. Data Processed

3.1. Data provided by the User:

- Full name
- Date of birth, nationality
- Residential and registration address
- Phone number, email address
- Passport data or other identity documents
- Tax Identification Number (TIN), if applicable
- Company representative information (if acting on behalf of a legal entity)
- Financial data: account details, banking/payment info (in anonymized form)
- Documents and other data provided for verification or KYC/AML purposes
- Other information submitted via feedback forms, loyalty programs, surveys, or support

3.2. Data collected automatically:

- IP address, browser type, language settings, device model, OS version
- Login/logout times, website activity
- Geolocation data (with permission)
- Transaction data and in-app actions
- Logs, cookies, pixels, session identifiers

3.3. Data from third parties:

- From affiliates and business partners
- From payment systems, verification providers
- From public records and government registries
- From authorized third parties acting on your behalf

4. Purposes of Data Processing

We process personal data for the following purposes:

- User registration and account management
- Access to Solution functionality
- Identity verification (KYC) and risk assessment (AML)
- Fulfillment of contractual obligations including transaction processing
- User support and response to requests
- Fraud and illegal activity detection/prevention
- Analytics, statistics, and service improvement
- Personalization of interface, notifications, and recommendations
- Marketing communications, including advertising
- Compliance with legal obligations and government requests

5. Legal Basis for Processing

Processing is based on:

- Execution of a contract with the User
- User consent
- Company's legitimate interests (e.g., fraud prevention, analytics)
- Legal obligations under incorporation jurisdiction

6. Data Retention

6.1. Personal data is retained as long as necessary for the purposes defined in Section 4, or until consent is withdrawn (if consent is the basis), or for periods set by law.

6.2. Retention may be based on:

- Contractual obligations
- Regulatory requirements (e.g., tax, accounting)
- Security, monitoring, or legal defense needs

6.3. Upon expiry of retention periods, data is deleted or anonymized unless required by law or ongoing legal proceedings.

6.4. Users may request data deletion if no other legal grounds for processing apply.

7. Data Disclosure

Data may be disclosed to:

- Affiliates
- Payment systems and financial institutions
- Cloud storage, analytics, technical support providers
- Marketing agencies
- Government authorities upon official request
- Legal successors (e.g., merger, acquisition)

8. Cross-border Transfers

We ensure appropriate legal safeguards when personal data is transferred across borders.

9. Cookies and Similar Technologies

9.1. We use cookies, pixels, and similar technologies to:

- Identify Users during login
- Store preferences and session parameters
- Analyze behavior on the site/app
- Improve Solution functionality
- Show personalized ads and recommendations

9.2. Cookies may be session-based (deleted after session) or persistent (stored for a period).

9.3. Users can manage cookies in their browser/device settings. Disabling cookies may limit functionality.

10. Automation and Profiling

10.1. We may use automated processing and profiling to:

- Assess risks and prevent fraud
- Provide personalized features and notifications
- Improve UX and interface
- Automate decision-making (e.g., pre-approval for operations or KYC)

10.2. Users have the right to:

- Request information on the logic, significance, and consequences of automation
- Request human intervention
- Object to automated decisions
- Appeal the result of such processing

11. User Rights

Users have the right to:

- Access their personal data
- Correct or update data
- Request deletion ("right to be forgotten")
- Restrict processing
- Withdraw consent
- File complaints with data protection authorities
- Opt-out of marketing communications

Requests should be submitted to the Service's email (see Section 2). We commit to respond within 30 calendar days. Withdrawal of consent does not affect prior lawful processing.

12. Data Protection Measures

12.1. The Company implements technical, organizational, and legal measures to protect data from:

- Unauthorized access
- Alteration, destruction, or disclosure
- Accidental loss
- Illegal processing

12.2. Measures include:

- Data encryption in transit
- Access segmentation and authorization
- Log and security audit trails
- Two-factor authentication

- DDoS and malware protection
- Regular infrastructure testing

12.3. Staff undergo internal training on personal data processing and protection.

13. External Links

The Service may contain links to third-party websites. The Company does not control their privacy policies or security practices. We recommend reviewing their policies separately.

14. Policy Updates

We reserve the right to amend this Policy at any time. Updates take effect upon publication on the website or within the Solution interface. Users are advised to periodically review it. Continued use indicates acceptance of the revised Policy.

15. Governing Law and Jurisdiction

This Policy is governed by and construed in accordance with the laws of the Company's country of incorporation. Disputes regarding personal data processing shall be resolved in the appropriate court of that jurisdiction.