

Privacy Policy

(Updated: 05th October 2025)

LunaPay Limited, (“Luna Wallet” / “we”, “our”, “us”) is a private limited liability company registered in the **United Kingdom** under company number **12409501**.

LunaPay Limited is an **Authorised Payment Institution** licensed by the **Financial Conduct Authority (FCA)** under registration number **935095**, authorised to provide regulated payment services under the supervision of the FCA (<https://www.fca.org.uk>).

Luna Wallet is committed to respecting your privacy and any information that may disclose your identity (“**Personal Data**”).

This Privacy Policy (“**Policy**”) describes our policies regarding the collection, usage, protection and processing of personally identifiable information received from users (“**User**”, “**You**”).

We do not collect any information that may identify you without your permission. However, by using our services, you give us your consent and permission to collect, store and use information about you, including your personal information, as prescribed by this Policy.

This Privacy Policy aims to inform you about how and why we collect, use, disclose, store and protect your Personal Data in connection with your use of our website and any of our related services.

Please note that you are not required to transfer your information to us; however, if you choose not to, it may substantially limit your ability to use and enjoy our products and services.

LUNA WALLET Information

LunaPay Limited is an authorised payment institution established under the laws of the United Kingdom.

Registration number: 12409501

Office address: Office 211, Epworth House, 25 City Road, London, England, EC1Y 1AA

Website: <https://luna-wallet.com>

E-mail: system@luna-wallet.com

Our website may, from time to time, contain links to and from the websites or mobile applications of our partner networks and affiliates. If you follow one of these links, please note that these links and destinations have their own privacy policies, and we do not accept any responsibility or liability for these policies. Please check these policies before you submit any information via these links or destinations.

Collection of Information

Luna Wallet gathers various types of information, including information that identifies or may identify you (“**Personal Data**”). We collect and use information that you voluntarily provide through our website, when you contact us, apply for employment with us, or use a service integrated with our systems.

We may also collect and use information about you that is provided by third parties.

We may collect information provided or generated whenever the user takes any action on our website or wallet service, such as:

- When an individual registers for an account, we request information including name, email address, physical address, country of residence, contact phone numbers, date of birth, tax identification number, employment details, and may request bank account and payment card details;
- Information about yourself provided to us, including (but not limited to) name, email address, mailing address, phone number, alias and password used as your account identifier;
- IP address;
- Device information (including identifiers), platform type, geolocation data, internet service provider, operating system and language;
- During our relationship, we may request additional information to verify identity, address or other data to manage risk and comply with legal obligations. We may obtain information from third parties such as fraud prevention agencies and KYC/AML service providers;
- If you participate in a customer survey, we may ask for your name, email address and responses;
- If you report a problem or submit feedback, we may ask for your name, email address and account details.

Use of Information

Luna Wallet will use Personal Data to carry out its operations as a payment service provider, to perform activities related to your use of our website, and to improve our services.

This may include:

- Account administration, following customer instructions, facilitating payments and verifying information;
 - Providing other requested services or products;
 - Ensuring compliance with applicable laws and regulations, including tax, legal, reporting and audit obligations;
 - Detecting, preventing and reporting fraudulent, prohibited or illegal activities;
 - Maintaining relationships and fulfilling obligations to partners, banks and card programs;
 - Improving our website, app, content and customer experience.
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Legal Framework for Processing Personal Data

Luna Wallet will only collect, process, or transfer your Personal Data for any of the following reasons:

- **Execution of a contract:** to enter into and fulfil agreements with you, including providing our services, communicating about your account, and resolving complaints;
 - **Compliance with legal obligations:** to meet requirements under AML/CFT laws, fraud prevention, banking regulations, and tax reporting;
 - **Consent:** when you have given explicit permission for specific processing purposes.
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Share and Disclosure of Information to Third Parties

Luna Wallet may share and disclose Personal Data under the following limited circumstances:

- With business agents, affiliates, and partners (including member banks and financial institutions) that perform services on our behalf, provide co-branded services, or assist in service delivery;
- With third parties providing analytics, advertising, or technical support services — such parties are prohibited from using Personal Data for any other purpose;

- When required by law, regulation, or government authority.
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Your Rights and Controlling Your Personal Information

Your choice: By providing personal information to us, you understand that we will collect, hold, use and disclose it in accordance with this Privacy Policy. You are not required to provide personal information; however, doing so may affect your ability to use our services.

Information from third parties: If we receive personal information about you from a third party, we will protect it as outlined here. If you provide information about another person, you must have their consent.

Marketing permission: If you previously agreed to receive marketing communications, you may withdraw consent at any time by contacting us.

Complaints: If you believe we have breached data protection laws, please contact us using the details below. We will investigate and respond in writing. You also have the right to contact your local data protection authority (e.g., the **ICO** in the United Kingdom).

Unsubscribe: To opt out of marketing communications, contact us at system@luna-wallet.com or use the opt-out option provided in emails. We may request information to verify your identity.

You have the following rights regarding your Personal Data:

- **Right of access:** obtain a copy of your data and supplementary information.
- **Right to withdraw consent:** if you have consented to processing, you may withdraw it at any time.
- **Right to rectification:** request corrections to inaccurate or outdated data by emailing system@luna-wallet.com.
- **Right to erasure (“right to be forgotten”):** request deletion of your data when no longer required, subject to record retention laws.
- **Right to data portability:** obtain a copy of your data in a structured, machine-readable format, or request its transfer to another organisation.
- **Right to object and automated decision-making:** refuse processing based solely on automated decisions that affect you.

- **Right to complain:** lodge a complaint with a supervisory authority.
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Data Retention

Luna Wallet is an authorised payment institution established under the laws of the United Kingdom and is required by **AML/CFT regulations** (including the Fifth Money Laundering Directive (EU) 2018/843) to retain some Personal Data, including transactional data, for **up to 5 years**.

We may retain data longer if necessary for compliance, fraud monitoring, legal defence, or historical recordkeeping.

Retention periods may vary based on legal requirements and jurisdiction.

International Data Transfers

Luna Wallet may use external service providers located both within and outside the **European Economic Area (EEA)** or **United Kingdom**.

When transferring Personal Data internationally, we ensure adequate protection via **Standard Contractual Clauses (SCCs)** or equivalent safeguards, ensuring all vendors treat your data with the same level of protection as required by GDPR.

Security

We apply technical, organisational, and administrative security measures to protect Personal Data against loss, alteration, unauthorised access or disclosure.

These include encryption, secure storage, firewalls, and internal access controls.

Children

We do not knowingly collect or process Personal Data from anyone under the age of **18**. If you believe that a minor has submitted data to us, please contact us immediately at system@luna-wallet.com.

Cookies and Other Tracking Technologies

We use cookies and similar technologies to enhance your experience, analyse usage, and support security.

Purposes include:

- Understanding how users interact with our site;
- Analysing website performance and usage patterns;
- Delivering relevant content and advertising;
- Remembering preferences such as language;
- Measuring and improving overall functionality.

We classify cookies as:

- **Strictly necessary cookies**
- **Performance cookies**
- **Functional cookies**
- **Targeting cookies**

You can manage or disable cookies through your browser settings.

Terms of Service

You may review our **Terms of Service** on our website: <https://luna-wallet.com>

Changes to This Policy

We may update this Privacy Policy periodically to reflect changes in legal requirements or business processes.

If significant updates occur, we will notify users by email or via our website.

You are responsible for periodically reviewing this Policy for the latest version.

Contact Us

For any questions or concerns regarding your privacy, please contact us:

LunaPay Limited

Office 211, Epworth House, 25 City Road, London, England, EC1Y 1AA

Website: <https://luna-wallet.com>

E-mail: system@luna-wallet.com