

GLOBALPAY WSFX LIMITED

Last Updated: 22 September 2026

1. Introduction & Scope

GlobalPay WSFx Limited (hereinafter referred to as "Company", "we", "us", "our", or "GLOBALPAY") respects your right to privacy and is committed to protecting your personal data in accordance with applicable data protection laws, including the Digital Personal Data Protection Act, 2023 (DPDPA).

In this Privacy Notice, "You" or "Data Principal" refers to any individual whose personal data is collected, received, stored, or processed by GLOBALPAY.

This Privacy Notice explains how we collect, use, disclose, retain, and safeguard your personal data when you visit our website <https://www.wsfxglobalpay.com/> (the "Website"), access our web portals, mobile applications (the "App"), digital bots, or utilize our foreign exchange, payment, and remittance services.

Notice on Language Availability: In compliance with Section 5 of the Digital Personal Data Protection Act, 2023 (DPDPA), this Privacy Notice is available in English and can be accessed upon request in any of the 22 official languages specified in the Eighth Schedule to the Constitution of India.

2. Role of GlobalPay (Data Fiduciary vs. Data Processor)

GlobalPay WSFx Limited processes personal data under distinct legal roles depending on the specific operational context and service provided:

- **As a Data Fiduciary / Data Controller:** GLOBALPAY acts as a Data Fiduciary (or Controller) when we directly determine the purpose and means of collecting and processing personal data. This includes scenarios where retail customers, business partners, website visitors, job applicants, or employees interact directly with GLOBALPAY to avail of our foreign exchange, remittance, card issuance, or account management services.
- **As a Data Processor:** GLOBALPAY acts as a Data Processor when processing personal data solely on behalf of, and pursuant to the documented, lawful instructions of, another Data Fiduciary/Controller (e.g., enterprise clients or partner financial institutions). Where GLOBALPAY acts solely as a Data Processor, data principals are encouraged to direct their individual rights requests to the primary Data Fiduciary, though GLOBALPAY will provide reasonable support to facilitate such requests.

3. Categories of Personal Data Collected & Processing Purposes

We collect and process only the personal data that is strictly necessary to fulfill legal, regulatory, operational, and service requirements. Generic or non-applicable data categories—such as Social

Security Numbers, credit history scoring, hospital/booking software data, or net-worth declarations—have been excluded from our operations.

Category of Personal Data	Data Elements Collected	Purpose of Processing
Contact & Onboarding Data	Name, email address, phone number, residential address, city, and user registration details.	Account creation, user registration, service delivery, and direct customer communication.
Government & Identification Data (KYC)	Passports, driving licenses, PAN details, Voter ID, tax identification numbers, signatures, and government-issued IDs.	Mandatory Know-Your-Customer (KYC) verification, Anti-Money Laundering (AML) compliance, fraud prevention, and regulatory reporting.
Financial & Transaction Data	Bank account details, beneficiary names and bank details, payment card details (masked), transaction reason, and transaction history.	Processing foreign exchange transactions, international wire transfers, outward/inward remittances, customer invoicing, and refunds.
Technical & Device Data	IP address, browser type and version, time-zone settings, operating system, platform, device identifiers, and system logs.	System administration, network security, fraud detection, performance optimization, and web analytics.
Inquiry & Support Data	Details submitted via contact forms, call-back requests, customer care interactions, live chatbots, or email inquiries.	Addressing customer queries, handling complaints, service updates, and operational support.
Marketing & Engagement Data	Communication preferences, event/webinar registrations, and promotional responses.	Delivering promotional communications and marketing updates (strictly based on explicit opt-in consent).
Recruitment & HR Data	CV, educational qualifications, employment history, date of birth, emergency contact details, health insurance details (for employees and dependents), and bank details.	Candidate evaluation, recruitment, employee onboarding, payroll administration, and workplace compliance.
CCTV & Premises Data	Visual CCTV footage recorded at company premises and branch locations.	Premises security, safety monitoring, and asset protection.

4. Disclosure & Sharing of Personal Data

Keeping customer information secure is a top priority for GLOBALPAY. We do not sell or rent personal data. We share personal data only under the following legitimate circumstances:

- **Service Providers & Vendors:** Authorized third-party service providers, IT infrastructure hosts, payment gateways, and banking partners who process data on our behalf under strict Non-Disclosure Agreements (NDAs) and statutory data protection obligations.
- **Regulatory & Government Authorities:** Statutory bodies, judicial authorities, enforcement agencies, or Reserve Bank of India (RBI) regulators where disclosure is mandatory under applicable laws or court orders.
- **Corporate Transactions:** Legal entities involved in a corporate merger, acquisition, restructuring, or asset transfer, subject to strict confidentiality terms.
- **Consent-Based Sharing:** Any external party where you have provided explicit, written consent for data sharing.

5. Lawful Bases for Data Processing

Under the Digital Personal Data Protection Act, 2023 (DPDPA), GLOBALPAY processes personal data on the following lawful grounds:

- **Consent:** Processing based on your free, specific, informed, unconditional, and unambiguous consent. Consent can be withdrawn at any time by emailing privacy@wsfxglobalpay.com.
- **Certain Legitimate Uses:** Processing required to fulfill statutory duties, comply with law enforcement or judicial mandates, perform state functions, address medical emergencies, or manage employer-employee relationships in accordance with Section 7 of the DPDPA.

6. Communications & Marketing Consent Mechanism

We maintain a strict distinction between mandatory service communications and optional marketing updates:

- **Service & Transactional Communications:** By registering on our platform or utilizing our forex/remittance services, you receive essential communications related to transaction statuses, security alerts, account verification, and regulatory notifications. These are mandatory for service execution.
- **Promotional & Marketing Communications:** Marketing messages, special offers, and newsletter updates are sent ONLY if you explicitly opt in. Marketing consent is valid even if your number is on a National Do Not Disturb (DND/NCPR) registry, provided specific opt-in consent was recorded. You may opt out of promotional communications at any time via the 'Unsubscribe' link in any promotional email or by contacting privacy@wsfxglobalpay.com.

7. Data Retention Policy & Specific Timelines

GLOBALPAY retains personal data only for as long as necessary to fulfill the primary collection purposes or as required under statutory retention mandates:

- **KYC & Transaction Records:** Retained for a minimum period of 5 years following the termination of the business relationship or completion of transaction, strictly complying with the Prevention of Money Laundering Act (PMLA), 2002, and RBI Master Directions.
- **Account Registration Data:** Retained for the active duration of the user account plus statutory limitation periods post-closure.
- **Marketing Data:** Retained until you withdraw consent or request unsubscription.
- **Customer Support & Inquiry Records:** Retained for 3 years post-resolution for quality assurance and grievance audit logs.
- **Technical Logs & Cookies:** Retained in accordance with cookie expiry parameters or up to 1 year for security log analysis.

8. Third-Party Links & External Services

Our Services may contain links to third-party websites or integrated applications. GLOBALPAY is not responsible for the privacy policies or security practices of external platforms. We encourage users to review the privacy notices of external sites before submitting personal data.

9. Protection of Children & Persons with Disabilities

- **Minors:** Our services are not targeted toward individuals under 18 years of age. Under Section 9 of the DPDPA, GLOBALPAY strictly prohibits processing personal data of children that could cause detrimental effects, nor do we engage in targeted advertising or behavioral tracking of minors.
- **Persons with Disabilities:** Verifiable consent from a lawful guardian is obtained prior to processing the personal data of a person with a disability, in accordance with applicable rules.

10. Data Security Measures

GLOBALPAY implements robust technical, organizational, and physical safeguards to protect personal data against unauthorized access, loss, alteration, or disclosure, including end-to-end encryption, role-based logical access controls, perimeter firewalls, physical security presence, and regular vulnerability assessments.

11. Data Principal Rights under DPDPA 2023

As a Data Principal, you hold the following rights under the DPDPA framework:

- **Right to Access:** Obtain a summary of your personal data being processed and details of Data Processors involved.

- **Right to Correction & Erasure:** Request updating, correction, or completion of inaccurate data, or erasure of personal data when processing is no longer required.
- **Right to Grievance Redressal:** Register grievances regarding data processing with our Grievance Redressal Officer prior to escalating to the Data Protection Board of India (DPBI).
- **Right to Nominate:** Nominate an individual to exercise your privacy rights in the event of death or incapacity.

12. Grievance Redressal Officer & Contact Details

Entity Name: GlobalPay WSFx Limited

Grievance Redressal Officer: Grievance Officer

Registered Office Address: Unit No. 603, 6th Floor, Wing C, Corporate Avenue, New AK Link Road, Chakala, Opp. Solitaire Corporate Park, Andheri (East), Mumbai - 400093, Maharashtra, India.

Grievance Email: grievance.redressal@wsfxglobalpay.com

Contact Phone: +91 8976707222

Annexure A: GDPR Provisions for EEA Residents

1. Scope & Legal Bases

Applies to processing of personal data under GDPR (EU) 2016/679. Legal bases include Consent, Contractual Necessity, Legal Obligation, and Legitimate Interests.

2. GDPR Data Subject Rights

EEA individuals hold rights including Access, Rectification, Erasure, Restriction of Processing, Data Portability, Right to Object, and Rights regarding Automated Decision-Making.

3. DPO & EU Representative Contact

Designated Data Protection Officer (DPO): dpo@wsfxglobalpay.com