

Acceptable Use Policy

Holvi Payment Services Ltd

Introduction

Safety and Compliance with the law are core values at Holvi Payment Services Ltd. (“Holvi”). To fulfil our mission to help freelancers and entrepreneurs start, run and grow a thriving business while staying safe and compliant, we have set up the following Acceptable Use Policy (“AUP”). The AUP is a set of rules that we follow for user acceptance. We communicate transparently what business activities are supported by Holvi but please be aware that the following information is not exhaustive and Holvi reserves the right, not to specify every company activity in the AUP in detail.

Before opening an account, please check whether any of the points below apply to your business. Our lists are detailed, but reading them to the end will help you determine whether Holvi is a good fit for your business. (We hope it is.)

For better readability, we have sorted the AUP in three categories:

- The first category includes activities we don't support
- The second category contains business activities that require a pre-approval before opening a Holvi account and
- The third category lists business activities that might be restricted or partially allowed and therefore require an enhanced compliance assessment with additional information and details

We do not question some of the latter business activities however we are simply unable to accommodate these business activities at this point in time. As we grow we hope to be able to accommodate a wider range of customers and this list as well as the whole document is subject to changes.

Activities we don't support

- 1.1 - Violate any law, statute, ordinance or regulation
- 1.2 Violate applicable laws or industry regulations regarding the sale of alcoholic drinks or prescription drugs and devices
- 1.3 - Violate copyright, trademark, right of publicity or privacy or any other proprietary right under the laws of account owner's jurisdiction
- 1.4 - Are performed on behalf of a legal entity not based within the EEA
- 1.5 - Any illegal products, services or activities, including encouraging, promoting, facilitating or instructing others to engage in illegal activities
- 1.6 - Payments to or from any listed sanctioned countries. Businesses or businesses with persons subject to international/national sanctions, suspected or convicted of terrorism, financial crime or any other offence
- 1.7 - Providing false information relating to the customer's identity or business activities
- 1.8 - Any product, service or activity that finance terrorism
- 1.9 - Narcotics, steroids, certain controlled substances or other products that present a risk to consumer safety, products including THC, CBD or any other similar substance, any activity that relate to drug paraphernalia
- 1.10 - Holding companies
- 1.11 - Products, services or activities including media and journalism, that could be considered as being of a discriminatory, hateful, racist or exploitative nature, or of inciting harassment, bestiality, mutilation or violence
- 1.12 - Connected to services where the service provider collects money on behalf of others as a payment services provider, cheque encashment agencies, bureaux de change, money transmitters, traveler's cheques or money orders
- 1.13- Involving ammunition, explosives, arms, defence or weapons, replica weapons, gun parts or related parts or accessories, hunting, manufacture/distribution of weapons
- 1.14 - Services relating to hospitality timeshares or issuing of travel visas

- 1.15 - Promotion or advertising of products or services other than your own without appropriate authorisation
- 1.16 - Collecting money without a license when compulsory in the account owner's jurisdiction
- 1.17 - Multi-level marketing programs, network sales, matrix programs, outbound and inbound telemarketing or other similar programs including pyramid and Ponzi schemes
- 1.18 - Gambling, betting activities, casinos, lotteries, sweepstakes, penny auctions, services related to fantasy sports or sports forecasting, or sale of value usable “chips” or vouchers connected to this services, certain in-purchasing games
- 1.19 - Programs, materials or services related to get-rich courses or related to increasing your wealth or gambling
- 1.20 - Sub-acquiring or merchant aggregation
- 1.21 - Factoring, lending, investment services, financial, escrow or mortgage services, pawn shops
- 1.22 - Private business directories, businesses specialising in warning letters, liquidation or proxy services
- 1.23 - Buying or selling stocks, bonds, securities, options, futures, binary options or investment interest in any entity or property, services related to raffles, debt consolidation, insurance brokers, payday lenders, medical collections, scholarship programs, payment protection insurance, currency exchange or FOREX activities
- 1.24 - Products or services related to the Second World War
- 1.25 - Modification chips (e.g. to modify a games console in order to use non-producer hardware or software)
- 1.26 - Ticket agencies without a license, ticket resale
- 1.27 - Replica clothes and products, or counterfeit goods
- 1.28 - Objectionable, offensive, indecent, harassing, threatening, embarrassing, distressing, vulgar, hateful, racially, ethnically or sexually offensive, or otherwise inappropriate behaviour towards the Holvi Payment Services Oy personnel
- 1.29 - Highly rated politically exposed persons (PEP)

1.30 - Holding funds in Holvi for 3rd parties

Business activities that require a Pre-Approval

At Holvi, we know that things aren't always black and white. Sometimes we can only make a decision after a special assessment. If the pre-approval activity is listed below for your respective country, it will require a pre-approval process. If the pre-approval activity is not available in your country, it means we don't support such activity for that country.

Pre-approval of activities in Germany and Finland:

- 2.1 Church-like organisations or religious groups
- 2.2 Charitable organisations
- 2.3 Money and debt collection services with or without a license

Pre-approval of activities in Finland:

- 2.4 Political affiliations

Pre-approval of activities in Finland, Germany, Austria:

- 2.5 Sale of planes boats, motor vehicles, auto parts and accessories or auto services
- 2.6 Accounting and bookkeeping services

Pre-approval of activities in all markets where we are present:

- 2.7 Real estate services

Business activities that might be restricted or will require additional information and details

- 3.1 - Tobacco and related products including electronic cigarettes
- 3.2 - Electronic items and devices
- 3.3 - Art dealers
- 3.4 - Any item, service or activity that could be considered of sexual or adult nature
- 3.5 - Live animals or endangered animal species
- 3.6 - The selling of on package travel, package holidays and package tours as defined in the Council Directive 90/314/EEC¹¹
- 3.7 - Virtual, digital or cryptocurrency-related activities including digital wallet services, sale of vouchers, value cards or valuable usable “chips”
- 3.8 - Dating services
- 3.9 - Products, services or activities relating to astrology, fortune-telling or palm reading
- 3.10 - Jewels, precious metals and stones, wholesale of scrap metal, unregistered waste management business

These activities might be subject to certain restrictions and an enhanced compliance review, they will need to be evaluated individually, they might be also subject to additional information and details

Violations and Enforcement of the Acceptable Use Policy

By opening an account at Holvi Payment Services you agree to the following:

1. You adhere to the Holvi Terms of Service, Privacy Policy and this AUP when opening an account with Holvi.
2. You are required to inform Holvi as soon as possible of any changes to your business activity.
3. You are independently responsible for complying with all applicable laws and regulations in all of your actions related to

your use of Holvi. You are independently responsible for not using the Holvi service for transactions that may be considered illegal in your jurisdiction.

4. Holvi reserves the right, in its sole discretion, to amend the list of prohibited activities with immediate effect.
5. If Holvi has reasonable grounds to believe that you may be engaging in or have engaged in fraudulent activities or activities that violate any of the terms and conditions of this AUP, Holvi may suspend or terminate your access to the Holvi service without prior notice.

If you notice a violation of Holvi's AUP

Please inform us right away if you spot any violations of this policy.

Got questions or need support?

We're always happy to help.

FAQ – Here you'll find answers to the most frequently asked questions, 24/7.

Live chat – Our support team is available weekdays from 10am to 3pm via Holvi live chat.

Email – Send us a support request and we'll get back to you as soon as possible.