

Globepay Privacy Policy

Last updated: 28/06/2019

This privacy policy (this "Policy") describes how we collect, use, process, and disclose your information, including personal information, in conjunction with your access to and use of Globepay Service.

When this policy mentions “we,” “us,” or “our,” it refers to the respective company, providing Globepay Services to the Client, as defined in other legal agreements of Globepay service, that is responsible for your information under this Privacy Policy (the “Data Controller”)

For the purposes of this documents Globepay Services consist of products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by us through mobile apps, online platform, official social media platforms, or other online properties through which we provide payment and e-money services.

We give utmost importance to the protection of personal data of our customers. In the following Privacy Policy, we inform the Client about the collection, use and processing of your personal data when you apply, register or use Globepay Service and all functionalities, included in the Service, including our website <https://www.globepay.co/> (hereinafter: "Website"), GF Pay mobile App and Globepay Merchant Online Portal.

Globepay Service is designed for business purposes and may be used by individuals or entities. In case you are registering for and/or using Globepay Services on behalf of an entity we will treat you as authorized person and you may be obliged to disclose to us personal data of the legal representatives, the employees, the agents, the beneficial owners or any other third-party related to the entity pursuant to the rules described below. You certify that where you have provided information regarding any third person beside yourself you have received prior consent from that other person to provide their personal information to us.

1. What Information We Collect

You are informed that there are three general categories of information that is collected from you differentiated on grounds as defined by the Regulation 2016/679 and The Data Protection Act 2018.

1.1 Information that we collect in order to perform our legal obligations and in order to provide Globepay Service as part of our contract with you.

We ask for and collect from you the following personal information when you use the Globepay Service. This information is necessary for us to comply with our regulatory obligations and for the adequate performance of the contract between you and us. Without it, we may not be able to provide you effectively with Globepay Service for which you register

- Registration and Use of Account Information. When you sign up for Globepay Service, we

require certain personal information such as:

- First name and last name
 - Date of birth
 - Email address
 - Mobile number
 - Nationality
 - Residential Address
 - And other data which we may choose to collect in our enrol forms, which is necessary for your identification and verification.
- Identity Verification Information. In accordance with our legal obligations under the relevant Anti-money laundering and anti-terrorism financing regulations, we are obliged to verify your identity or the identity of the authorized user who is opening the Account (in case of company or other entity, referred to as “user opening the Account”).
 - Identification documents and all data from the identification document
 - Risk and Fraud related information. In order to comply with relevant Anti-money laundering and anti-terrorism financing regulations we collect personal data regarding you, such as demographic data or fraud detection information, from third party service providers and/or partners, and combine it with information we have about you
 - For example, we may receive background check results (with your consent where required) or fraud warnings from service providers like identity verification services for our fraud prevention and risk assessment efforts. We may receive information about you and your activities on and off Globepay Service through partnerships, or about your experiences and interactions from our partner and networks.
 - Annual turnover estimates, transaction amount estimates, business activity details. In order to comply with relevant Anti-money laundering and anti-terrorism financing regulations we collect personal data regarding you related to your sources of income and any other similar financial information about you which would help us prevent money laundering and/or terrorism financing
 - Business bank account information. We collect information of your bank account to make correct settlement. The information include bank name, account name, account number and sort code.
 - Payment Transaction Information. We collect information related to your payment transactions under Globepay Service. For example, transaction amount, how transaction is performed, status of each transaction. We will not collect data of your end-customer.

1.2 Information that we collect with your consent

You may choose to provide us with additional personal information when you fill in a form, conduct a search, update or add information to your Globepay Account, respond to surveys, participate in promotions, or use other features of the Globepay Service. This additional information will be processed based on your consent.

1.3 Information We Collect from Your Use of the Globepay Service

Please be advised that when you use Globepay Service, we automatically collect some of the personal information described in the sections above such as Geo-location Information, Log Data and Device Information, Cookies and Similar Technologies, Payment Transaction Information. This information is necessary given our legitimate interest in being able to provide and improve the functionalities of the Globepay Service

- **Geo-location Information.** When you use certain features of the Globepay Platform, we may collect information about your precise or approximate location as determined through data such as your IP address or mobile device's GPS to offer you an improved user experience. Most mobile devices allow you to control or disable the use of location services for applications in the device's settings menu. We may also collect this information even when you are not using the app if this connection is enabled through your settings or device permissions. The legitimate interests that we pursue with this processing is the identification of location-specific problems (i.e. coverage problems for SMS-sending purposes) and other statistical information, which helps us improve our services.
- **Usage Information.** We collect information about your interactions with Globepay Service such as your usage of any Apps or Functionalities, and other interactions with Globepay Service. The legitimate interests that we pursue with this processing is collection of crash reports and other statistical information, which helps us improve our services.
- **Cookies and Similar Technologies.** We use cookies and other similar technologies, such as web beacons, pixels, and mobile identifiers. We may also allow our business partners to use these tracking technologies on Globepay Service or engage others to track your behavior on our behalf. While you may disable the usage of cookies through your browser settings, Globepay Platform currently does not respond to a "Do Not Track" signal in the HTTP header from your browser or mobile application due to lack of standardization regarding how that signal should be interpreted. For more information on our use of these technologies, see our Cookies Policy.

2. How We Use Information We Collect

We use, store, and process information, including personal information, about you to provide, understand, improve, and develop Globepay Service, create and maintain a secure environment, pursue our legitimate interests and comply with our legal obligations.

2.1 Provide, improve and develop the Globepay service

- Enable you to access and use the Globepay Service;
- Process purchase payments, issue invoices and or other kind of payment documents for the processed order;
- To organize shipment of ordered Terminals;
- To manage return procedure and refunds for defected devices.
- Operate, protect, improve, and optimize the Globepay Service and your experience, such as by performing analytics and conducting research;
- Provide customer service;
- Communicate with you about your Globepay Account and payment instruments;

- Send you service or support messages, updates, security alerts, and account notifications.
- If you provide us with your contacts' information, we may process this information: (i) to facilitate your payment transactions, (ii) process your requests, (iii) for fraud detection and prevention, and (iv) for any purpose you authorize at the time of collection.
- To operate, protect, improve, and optimize Globepay Service and experience, and personalize, customize your experience,
- Introduce you to our other Services
- Detect and prevent fraud, abuse, security incidents, and other harmful activity by blocking Globepay Service or by applying other fraud prevention measures;
- Conduct security investigations and risk assessments;
- Comply with legal obligations (such as anti-money laundering regulations);
- Enforce the our rights, interests and claims arising from the Legal Agreements.

We process this information given our legitimate interest in improving the Globepay Service and our clients' experience with it, and where it is necessary for the adequate performance of the contract with you as well as to comply with applicable laws.

2.2 Create and maintain a secure environment

- Detect and prevent fraud, spam, abuse, security incidents, and other harmful activity;
- Conduct security investigations and risk assessments;
- Generate one-time permission (OTP) codes for access to Globepay Account and for execution of payment transaction;
- Verify or authenticate information or identifications provided by you;
- Conduct checks against databases and other information third party sources, including background or police checks;
- Monitor your payment transactions;
- Enforce our legal rights.

3. With Whom Do We Share Personal Data

3.1 With third party service providers: We may share personal information with third party service providers that support us in providing Globepay Service, products and/or Platform with functions at our decision and our behalf.

These third-party service providers may for example:

- Verify your identity or authenticate your identification documents;
- Check information against public databases;
- Conduct background or police checks, fraud prevention, and risk assessment, perform risk monitoring;
- allow the provision of Globepay Service through third party platforms and software tools (e.g. through the integration with our APIs), or
- Provide customer support, IT support and development services;
- Resell and distribute Globepay products;

- Provide technical support for Globepay products;
- Promote Globepay Service as business introducers, promoters, sales agents or similar;
- Perform courier services on our behalf;
- Provide cloud, storage or collocations services;
- provide audit and accountancy services;
- provide legal, compliance or other consultancy services;
- Marketing and Public Relations services.

These providers have limited access only to your information necessary to perform the tasks for which they were contracted for on our behalf and are contractually bound to protect and to use it only for the purposes for which it was disclosed and consistent with this Privacy Policy.

3.2 With other third parties for our legitimate interest or as permitted or required by law: We may share information about you with other parties for our legitimate interest or as permitted or required by law, including:

- If we need to do so to comply with a law, legal process or regulations;
- To law enforcement authorities or other government officials, or other third parties pursuant to a subpoena, a court order or other legal process or requirement applicable to us;
- If we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss or in connection with an investigation of suspected or actual illegal activity;
- To protect the vital interests of a person;
- With credit agencies and data processors for credit reference checks and anti-fraud and compliance purposes;
- To investigate violations of or enforce a user agreement or other legal terms applicable to any Service;
- To protect our property, Services and legal rights;
- To facilitate a purchase or sale of all or part of our business;
- In connection with shipping and related services for purchases made using a Service;
- In relation to promoting Globepay Service to end users by third party business introducers and promoters;
- To help assess and manage risk and prevent fraud against us, our clients and fraud involving our websites, mobile apps and management portal or use of our Services, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals, and merchants;
- To companies that we plan to merge with or be acquired by; and
- To support our audit, compliance, and corporate governance functions.

With your consent: We also will share your Personal Data and other information with your consent or direction, including if you authorise an account connection with a third-party account or platform.

3.3 Aggregated Data. We may also share aggregated information (information about our users that we combine together so that it no longer identifies or references an individual user) and other anonymized information for regulatory compliance, industry and market analysis, demographic

profiling, marketing and advertising, and other business purposes.

3.4 We may monitor or record telephone calls, emails, web chat or other communications with you for regulatory, security, customer services or training purposes. When visiting our offices, CCTV, access control systems and/or other monitoring systems may be in operation.

3.5 If the Data Controller is involved in any merger, acquisition, reorganization, sale of assets, transfer of portfolio, bankruptcy, or insolvency event, then we may sell, transfer or share some or all of our assets, including your information in connection with such transaction or in contemplation of such transaction (e.g., due diligence). In this event, we will notify you before your personal information is transferred to a different legal person and/or becomes subject to a different privacy policy.

4. Your Rights

You may exercise any of the rights described in this section before the respective Data Controller pursuant to the Legal Agreements by sending an email from your e-mail registered for Globepay Service to the respective Company providing the Service to you under the respective Legal Agreement stated below. Please note that we may ask you to verify your identity before taking further action on your request. Please note that upon receipt of your e-mail we shall try our best to provide you with the requested information and resolve your request in reasonable time, subject to all obligations which we or the related companies have under the applicable laws.

4.1 Managing your information

You have the right to obtain the following:

- Confirmation of whether, and where, we are processing your personal data;
- Information about the purposes of the processing;
- Information about the categories of data being processed;
- Information about the categories of recipients with whom the data may be shared;
- Information about the period for which the data will be stored (or the criteria used to determine that period);
- Information about the existence of the rights to erasure, to rectification, to restriction of processing and to object to processing;
- Information about the existence of the right to complain to any Regulator;
- Where the data was not collected from you, information as to the source of the data; and information about the existence of, and an explanation of the logic involved in, any automated processing.
- Additionally, you may request a copy of the personal data being processed.

4.2 Rectification of inaccurate or incomplete information

You have the right to ask us to correct inaccurate or incomplete personal information concerning you (and which you cannot update yourself via your online access to Globepay Account).

4.3 Data access and portability:

You have the right to:

- Receive a copy of your personal data in a structured, commonly used, machine-readable

format that supports re-use;

- Transfer your personal data from one controller to another;
- Store your personal data for further personal use on a private device; and
- Have your personal data transmitted directly between controllers without hindrance.

4.4 Data Retention and Erasure

We generally retain your personal information for as long as is necessary for the performance of the contract between you and us and to comply with our regulatory obligations. If you no longer want us to use your information to provide Globepay Service to you, you can request that we erase your personal information and close your Globepay Account, providing your account is in good standing, not blocked or somehow limited for compliance, risk or regulatory reasons, or due to your outstanding obligation to us, court order, pledge or order by another regulator or other reason which prevent us by law to close your account or terminate the Service. Because we are a regulated financial institution under FCA, we are obliged under PSD and AML laws to keep your personal information and all transactions history for a period of 5 years after the termination of the relation with you. Please note that if you request the erasure of your personal information:

- We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing security. For example, if we suspend a Globepay Account for fraud or safety reasons, we may retain certain information from that Globepay Account to prevent that client from opening a new Globepay Account in the future. We are also obliged to retain personal data which we have collected for the purposes of complying with the relevant anti-money laundering and anti-terrorism financing for a period as defined under the applicable law, that is, 3 years after termination of the contract;
- We may retain and use your personal information to the extent necessary to comply with our legal obligations;
- Because we maintain the system to protect from accidental or malicious loss and destruction, residual copies of your personal information may not be removed from our backup systems for a limited period of time.

4.5 Withdrawing consent and restriction of processing

Where you have provided your consent to the processing of your personal information by us you may withdraw your consent at any time by changing your Account settings or by sending a communication to us specifying which consent you are withdrawing. Please note that the withdrawal of your consent does not affect the lawfulness of any processing activities based on such consent before its withdrawal. Additionally, in some jurisdictions, applicable law may give you the right to limit the ways in which we use your personal information, in particular where

- (i) you contest the accuracy of your personal information;
- (ii) the processing is unlawful and you oppose the erasure of your personal information;
- (iii) we no longer need your personal information for the purposes of the processing, but you require the information for the establishment, exercise or defence of legal claims; or
- (iv) you have objected to the processing and pending the verification whether our legitimate grounds override your own.

4.6 Objection to processing

In some jurisdictions, applicable law may entitle you to require us not to process your personal information for certain specific purposes where such processing is based on legitimate interest. If you object to such processing we will no longer process your personal information for these purposes unless we can demonstrate compelling legitimate grounds for such processing, or such processing is required for the establishment, exercise or defence of legal claims. Please note that we are obliged under AML laws to make risk profiling of their customers upon opening of the relationship and constantly during the relationship and this is a legitimate reason. In case you do not wish us to process your personal data for certain specific purposes, which are legitimate purposes to us, you shall have to close your account or we may have to stop providing you some or all of the Services, subject to all conditions for the closing of the account, specified above in this Section.

Where your personal information is processed for direct marketing purposes, you may, at any time ask us to cease processing your data for these direct marketing purposes by sending an e-mail to the contact e-mails below

4.7 Lodging complaints

4.7.1 You should in first place try to resolve the matter by sending an e-mail to the Data Protection Officer under this Privacy Policy from your registered e-mail for the Service:

Data Protection Officer: Cherry Hu

E-mail: support@globepay.co

Address: Level 30, Landmark, 40 Bank Street, London, E14 5NR

4.7.2 Competent Regulator. In case you are not satisfied with the reply or resolution of the respective Data Controller, you have the right to lodge complaints about the data processing activities carried out by us before the competent data protection supervisory authorities as described below.

Address:

Wycliffe House

Water Lane

Willmslow

Cheshire

SK9 5AF

e-mail: casework@ico.org.uk

5. International Transfers

5.1 Other means to ensure an adequate level of data protection

In case personal information is shared with corporate affiliates or third-party service providers outside the EEA in absence of an adequacy decision, we have - prior to sharing your information with such corporate affiliate or third-party service provider – established the necessary means to ensure an adequate level of data protection. We will provide further information on the means to

ensure an adequate level of data protection on request

6. Security

We take the responsibility to ensure that your personal information is secure, kept in an encrypted form on servers, collocated in Special data centres in Class A jurisdictions in Europe. To prevent unauthorized access or disclosure of information we maintain physical, electronic and procedural safeguards that comply with applicable regulations to guard non-public personal information. Once you are logged into your Account, all internet communication is secured using Secure Socket Layer (SSL) technology. We restrict access to your personally identifiable information only to employees who need to know that information in order to provide products or services to you.

If you know or have reason to believe that your Globepay Account credentials have been lost, stolen, misappropriated, or otherwise compromised or in case of any actual or suspected unauthorized use of your Globepay Account, please contact us following the instructions in the Contact Us section below. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and Account/profile registration information and verifying that the Personal Data we maintain about you is accurate and current.

7. Can Children Use Our Services

Globepay Service is not designed to individuals under the age of 18. We do not knowingly collect information, including Personal Data, from children or other individuals who are not legally able to use Globepay Service. If we obtain actual knowledge that we have collected Personal Data from an individual under the age of 18, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have mistakenly or unintentionally collected information from an individual under the age of 18.

8. Changes to This Privacy Policy

We reserve the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on Globepay Platform. If you disagree with the revised Privacy Policy, you may cancel your Account. If you do not cancel your Account before the date the revised Privacy Policy becomes effective, your continued access to or use of Globepay Platform will be subject to the revised Privacy Policy.

9. Contact Us

If you have any questions or complaints about this Privacy Policy or our information handling practices, you may email us from your registered e-mail for the Services to the e-mails stated above in Section 4.7.