

Privacy notice

Undated on August 1, 2020

Your privacy is important to us. This Privacy Notice describes how your personal data is collected and processed as the result of your use of our mobile application mWallet ("mWallet" and "App") and our Website ("Website", jointly named "Services"). If anything applies only to one of our services, we will directly point this out to you.

The responsible authority for the collection, processing and use of personal data is Wallet Factory Pl sp.z o.o ("WFI" "we," "us," "our," or the "Company") a company, established under the laws of Poland address St. Rydygiera 16/1 Wrocław, Poland 50-249.

As you review this Privacy Notice, here are a few general principles to notice:

- Our App and Website are not intended for children under 18 years. We do not knowingly collect and process children's personal data.
- The App is a demonstration version, which is intended solely to demonstrate the functionality of the mobile application and to introduce a product for the Company's potential customers.
- The Company does not provide any services to the individuals.

1. What personal data do we collect?

1.1. The App.

Some data that we use to be able to provide our service to you may be considered personal data. WE DO NOT REQUIRE YOU TO ENTER YOUR ACCURATE PERSONAL DATA, INCLUDING PHOTOS, EXCEPT FOR A MOBILE PHONE NUMBER FOR THE PURPOSE OF YOUR DEVICE VERIFICATION.

You directly provide us with the most data we collect. We collect and process data when you:

- go through the user verification procedure the first time you launch our App;
- use and view our App and Website via cookies;
- fill the profile information, bank card details, upload photos;
- allow our App to access your camera, photos, microphone, geolocation, contacts;

For users accessing the App from the European Economic Area ("EEA"), we are a Controller and a Processor of the personal data you provide through the App.

We may use the personal data stated herein for you to use, test and improve our App:

Identity data. Includes your phone number, name, surname, gender, age, address, NRC/Passport number, photos of your documents, bank card and personal photos. You enter this data when using the App only for purposes of testing its functionality. WE DO NOT REQUIRE YOU TO ENTER YOUR ACCURATE PERSONAL DATA.

Financial Data: includes information about your payment card data (card number, CVV, expiry date, cardholder name), bank account details. You enter this data when using the App only

for purposes of testing its functionality. WE DO NOT REQUIRE YOU TO ENTER YOUR ACCURATE FINANCIAL DATA.

Technical data: includes information about your mobile device (manufacturer, model, operation system version, device identifier and other technical parameters and identifiers, including IMEI); your IP address; geolocation if you allow such access; data about your activities when using the App; contacts, if you allow such access.

Usage information: includes information about how you use our App and our Website.

Phone numbers.

You should provide us with your phone number as part of your verification process in order to start using the App. You understand and agree that we will use your phone number to emulate the real authorization process, to confirm your device verification and help protect the security of your account. The part of the verification process consists of sending a text message containing a security code (one-time password, OTP code, etc.) to your phone number. You agree to receive this text message from us containing a security code as part of the verification process.

1.2. The Website.

We collect your name and email address you provided us for the purpose of contacting you (filling the contact form).

2. How do we collect your personal data?

2.1. The App.

You may provide us Identity Data and Financial Data by testing our App. We may also collect your personal data when you are contacting us through our communication channels.

We may automatically collect Technical Data and Usage Data through cookies, records and similar technologies during your interaction with the App.

2.2. The website.

You may provide as only with your name and email address by filling the contact form.

3. What is our purpose for processing your personal data?

3.1. The App.

WE COLLECT ANY OF YOUR PERSONAL DATA SOLELY FOR THE PURPOSE OF DEMONSTRATING OUR SERVICE AND TESTING ITS FUNCTIONALITY, DEVELOPING AND IMPROVING OUR SERVICE FOR YOUR NEEDS (SERVICE CUSTOMISATION).

Personal data	Purposes	Legal basis
Identity data, technical data and usage information	To provide the service, user verification, system maintenance, data analysis	contract performance and legitimate interest (to provide access to the App,

		demonstrate, test and improve the App)
Identity data, financial data, technical data and usage information	To demonstrate the App and test its functionality, to track our performance and improve the App	legitimate interest (demonstrate and test the App, develop and improve the services)
Identity data (name, surname, email)	To interact with you via our communication channels	your consent

3.2. The Website.

Identity data (name, surname, email)	to contact you	your consent
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We do not process your personal data for automated decision making.

4. With whom we share your personal data?

For the purpose of testing and demonstrating the functionality of our Service we do not transfer any of your personal data to the third parties, except our affiliates.

We may transfer and store your data at a destination outside the European Economic Area ("EEA") exclusively to our affiliates.

By submitting your personal data, you agree to this transfer, storing and processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy notice. In case there will be a necessity to transfer your personal data to our affiliates, we ensure to take adequate and appropriate technical, physical and organizational security measures to protect your data.

Your personal data is collected and processed in accordance with this Privacy Notice and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR).

We do not license, sell or transfer your personal data to anyone under any circumstances for the purpose of making a profit or contrary to our Privacy Notice or applicable law.

5. Where do we store your personal data?

We store your personal data on servers located within the EEA.

6. For how long your personal data is stored?

6.1. The App.

We keep your personal data only for the necessary period to fulfill the purposes for which we collect it, but no longer than one month starting from the last authorization date. You have the opportunity to initiate the deletion of your personal data at any time by clicking on the button - Delete my data.

6.2. The website.

We keep your personal data only for the necessary period for the purpose of contacting you, but no longer than one year starting the date you provided us with such personal data.

7. How can you withdraw your consent for processing your personal data?

You have the right to withdraw your consent to our processing of your information and your use of our Services at any time. Contact policy@walletfactory.com for assistance with exercising this right. You can choose to delete our App from your phone and also you may contact us at policy@walletfactory.com to enable the deletion of your information.

8. Your right regarding your personal data.

Regarding of the processing your personal you have the following rights:

- The right to be informed. You have the right to receive the information provided in this Privacy Notice. The relevant version of this Notice is always available on our website <https://walletfactory.com> at any given time.
- Right to access. You have the right to ask us to provide you with a copy of your personal data which we process.
- Right to Rectification. You have the right to ask us to rectify your personal data in case the data is incorrect or incomplete. WE DO NOT REQUIRE YOU TO ENTER YOUR ACCURATE PERSONAL DATA.
- Right to Erasure. You have the right to ask us to erase your personal data, unless we are obliged to continue processing your personal data under law or under a contract between you and the Company, or in case we have other lawful grounds for the continued processing of your personal data. In any case, we will delete your personal data as soon as we no longer have lawful grounds for processing your personal data according to Section 6 of this Privacy Notice.
- Right to Restriction. You have the right to ask us to restrict the processing of your personal data in case the data is incorrect or incomplete, or in case your personal data is processed unlawfully.
- Right to Data Portability. You have the right to ask us to provide you your personal data, which you yourself have provided to us and which is processed in accordance with your consent or a contract between you and the Company.
- Right to Object. You have the right to object to processing your personal data in case you believe we have no lawful grounds for processing this personal data. For any processing conducted in accordance with your consent, you can always withdraw your consent as stipulated in Section 7 of this Privacy Notice.
- Right to File Complaints. You have the right to file complaints regarding processing your personal data to the Information Commissioner's Office (ICO) in the United

Kingdom or the Data Protection Authority of the country in which you have permanent residence.

9. Cookies.

We use commonly-used information-gathering tools, such as cookies (small text files stored in your browser or on your device) and web beacons (small, clear picture files used to follow your movements on our website), to collect information as you navigate our website to distinguish you from other users, see how you use our site and products while providing you with the best experience. They also enable us to improve our services. For detailed information on cookies and other technologies we use and the purposes for which we use them, see our Cookies Policy.

10. Amendments to this Privacy Notice.

To keep up with changing legislation, best practice and changes in how we collect and process personal data, we may update and amend this Privacy Notice at any time without prior Notice by posting a revised version on our website. To stay up to date on any changes, check back periodically.

11. Contact us.

If you have any questions regarding this Privacy Notice, please feel free to contact us at policy@walletfactory.com.