

## **Data Privacy Policy, effective as of May 21, 2018**

Wallet Factory International (“WFI” “we,” “us,” “our,” or the “Company”) is committed to protecting the privacy of individuals who visit the Company’s Web sites (“Visitors”), individuals who register to use WFI products defined below either by trial or by a paid subscription (“Customers”), and individuals who register to attend the Company’s corporate events (“Attendees”). This Data Privacy Policy describes WFI’s privacy practices in relation to the use of the Company’s Web sites and the related Applications and services offered by WFI (collectively, the “Services”), as well as individuals’ choices regarding use, access and correction of personal information.

If you have questions or complaints regarding WFI’s Data Privacy Policies or associated practices, please contact us at [policy@walletfactory.com](mailto:policy@walletfactory.com).

### **General Principles**

WFI respects your privacy and seeks to protect your data. We hope that the information in this Data Privacy Policy will show you how we gather, use, and protect your personal data. We aim to ensure that the processing of personal data by or on behalf of WFI is fair and reasonable and that your personal data is secure, accurate, and up to date.

WFI’s Platform as a Service (PAAS) and its Services agreements are online and as a result they are international; hence personal data may be made available internationally, including in countries that do not have data protection laws or laws that provide equivalent protection to European.

### **Scope of this Data Privacy Policy**

This Data Privacy Policy covers the information practices, including how the Company collects, uses, shares and secures the personal information you provide, of Web sites that link to this Data Privacy Policy (collectively referred to as “WFI’s Web sites & products” or “the Company’s Web sites & products”). It applies to your use of our website and its child web-domains located underneath <https://walletfactory.com/> (the “website”), but does not apply to any third-party sites that may be linked to our website.

### **Information collected by WFI**

When expressing an interest in a trial of our products, or registering to use the Web sites, Mobile Application or other Services WFI requires you to provide the Company with personal contact information, such as name, email address, phone number (“Required Contact Information”). WFI may also require you to provide the Company with financial and billing information, such as billing name and address, credit card number that will be using in mobile applications (“Billing Information”). WFI may also ask you to provide additional information, such as country, your age, sex (“Optional Information”).

When Visitors apply for a job with the Company, WFI may also require you to submit personal information as well as a resume or curriculum vitae (“Applicant Information”) relevant to the job posting for which Company shall collect necessary information such as Contact Information, Applicant

Information, Optional Information and any other information you submit to WFI to or through the Services are referred to collectively as “Data.”

As you navigate the Company’s Web sites or Mobile Application, WFI may also collect information through the use of commonly-used information-gathering tools, such as cookies and Web beacons (“Web Site Navigational Information”). Web Site Navigational Information includes standard information from your Web browser (such as browser type and browser language), your Internet Protocol (“IP”) address, and the actions you take on the Company’s Web sites (such as the Web pages viewed and the links clicked). For additional information about the collection of Web Site Navigational Information by WFI please refer section “Web Site Navigational Information” below.

### **Purpose for collecting the information**

The Company uses Data about WFI Customers to perform the services requested. For example, if you fill out a “Request a Demo” Web form, the Company will use the information provided to contact you about your interest in the Services.

The Company also uses Data for giving you opportunities to use mobile wallet, loyalty programs, e-money all other our services.

The Company may also use Data about WFI Customers for marketing investigations and purposes. For example, the Company may use information you provide to contact you to further discuss your interest in the Services and to send you information regarding the Company, its affiliates, and its partners, such as information about promotions or events.

WFI may also receive information about Customers from other sources, including third parties from whom we have get data, and combine this information with Data we already have about you. This helps us to update, expand and analyze our records, identify new customers, and create more tailored advertising to provide products and services that may be of interest to you.

WFI collects information of a financial nature, such as user's payment card data (card number, CVV, expaired date) and transfers this data in an encrypted form to the payment institution or bank-partner for making payments using WFI services. At the same time, the WFI does not store payment card data, does not use this data for its own purposes and does not transfer this data to third parties that are not payment institutions or banks.

WFI uses Web Site Navigational Information to operate and improve the Company’s Web sites. The Company may also use Web Site Navigational Information alone or in combination with Data about WFI Customers to provide personalized information about the Company. For additional information about the use of Web Site Navigational Information, please refer section “Web Site Navigational Information” below.

WFI partners with third parties to display advertising on our Web sites and Services or to manage our advertising on other sites. Our third-party partners may use cookies or similar technologies provide you advertising based upon your browsing activities and interests. If you wish to opt out of interest-based advertising contact us at [policy@wallefactory.com](mailto:policy@wallefactory.com). Please note you will continue to receive generic ads.

## **Withdrawing consent**

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](mailto:policy@walletfactory.com) for assistance with exercising this right. Similar to the way in which you can give consent by interacting with our Services, you can also withdraw your consent through our Services. You can choose to delete your WFI mobile application and also you may contact us at [policy@walletfactory.com](mailto:policy@walletfactory.com) to enable the deletion of your information.

If you withdraw your consent to the use or sharing of your information for the purposes set out in this Data Privacy Policy, you may not have access to all (or any) of our Services and we might not be able to provide you with all (or any) of the Services under this Data Privacy Policy and our Terms of Service. In certain cases, we may continue to process your information after you have withdrawn consent if we have a legal basis to do so, or if your withdrawal of consent was limited to certain processing activities. For example, we may keep information if we need to do so to comply with a legal obligation, to resolve disputes and to enforce our agreements.

## **Retention of Information**

We retain information as long as it is necessary to provide the Services to you and others, subject to any legal obligations to further retain such information. Information associated with your account will generally be kept until it is no longer necessary to provide the Services or until you ask us to delete it or your account is deleted whichever comes first. For example, where you withdraw your consent to WFI processing your personal information, WFI will delete all personal information you uploaded. Following your deletion of your account, it may take up to 30 days to fully delete your personal information and system logs from our systems. Additionally, we may retain information from deleted accounts to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce the Terms of Service and take other actions permitted by law. The information we retain will be handled in accordance with this Data Privacy Policy.

Information about you that is no longer necessary and relevant to provide our Services may be de-identified and aggregated with other non-personal data to provide insights which are commercially valuable to WFI, such as statistics of the use of the Services.

## **Web Site Navigational Information**

### **Cookies, Web Beacons and IP Addresses**

WFI uses commonly-used information-gathering tools, such as cookies and Web beacons, to collect information as you navigate the Company's Web sites ("Web Site Navigational Information"). As described more fully below, we and our partners use these cookies or similar technologies to analyze trends, administer Web sites and Services, track users' movements around our Web sites and Services, serve targeted advertisements and gather demographic information about our user base as a whole. This section describes the types of Web Site Navigational Information used on the Company's Web sites and Services, and how this information may be used.

## **Cookies**

A "cookie" is a small file placed on your hard drive by some of our web pages. We may use cookies to help us analyze our web page flow, customize our services, content and advertising, measure promotional effectiveness and promote trust and safety. Cookies are commonly used at most major transactional websites in much the same way we use them on our Site(s).

WFI sites may also use Google Analytics to gather statistics on site usage. This may involve the use of cookies. There are more details in our Cookie Notice and in Google's own privacy policy. Google may aggregate data they collect from their various services including Google Analytics, Google Translate, Google Maps and YouTube. You acknowledge and accept that WFI has no control over Google's data collection. We strongly advise you to look at Google's privacy policy for details of their data collection practices, or you may want to opt out from Google Analytics please check here <https://tools.google.com/dlpage/gaoptout>.

WFI uses cookies to make interactions with the Company's Web sites easy and meaningful. When you visit one of the Company's Web sites, WFI's servers send a cookie to your computer. Standing alone, cookies do not personally identify you; they merely recognize your Web browser. Unless you choose to identify yourself to WFI, either by responding to a promotional offer, opening an account, or filling out a Web form (such as a "Contact Me" or a "30 Day Free Trial" Web form), you remain anonymous to the Company.

## **Web Beacons**

WFI uses Web beacons alone or in conjunction with cookies to compile information about Customers and Visitors' usage of the Company's Web sites and interaction with emails from the Company. Web beacons are clear electronic images that can recognize certain types of information on your computer, such as cookies, when you viewed a particular Web site or Service tied to the Web beacon, and a description of a Web site or Service tied to the Web beacon. For example, WFI may place Web beacons in marketing emails that notify the Company when you click on a link in the email that directs you to one of the Company's Web sites. WFI uses Web beacons to operate and improve the Company's Web sites, Services and email communications.

## **Log Files, IP Addresses, URLs and Other Data**

As is true of most Web sites, we gather certain information automatically to analyze trends in the aggregate and administer our Web sites and Services. This information may include your Internet Protocol (IP) address (or the proxy server you use to access the World Wide Web), device and application identification numbers, your location, your browser type, your Internet service provider and/or mobile carrier, the pages and files you viewed, your searches, your operating system and system configuration information, and date/time stamps associated with your usage. Due to Internet communications standards, when you visit or use the Company's Websites and Services, we automatically receive the URL of the website from which you came and the website to which you go when you leave our Website. This information is used to analyze overall trends, to help us improve our

Websites and Services, to track and aggregate non-personal information, and to provide the Websites and Services. For example, WFI uses IP addresses to monitor the regions from which Customers navigate the Company's Web sites. WFI also collects IP addresses from Customers when they log into the Services as part of the Company's "Identity Confirmation" and "IP Range Restrictions" security features.

### **Social Media Features and Single Sign-on**

The Company's Web sites may use social media features, such as the Facebook "like" button ("Social Media Features"). These features may collect your IP address and which page you are visiting on the Company's Web site, and may set a cookie to enable the feature to function properly. You may be given the option by such Social Media Features to post information about your activities on the Company's Web site to a profile page of yours that is provided by a third party social media network in order to share with others within your network. Social Media Features are either hosted by a third party or hosted directly on the Company's Web site. Your interactions with these features are governed by the Data Privacy Policy of the company providing the relevant Social Media features.

### **Not Track**

Currently, various browsers — including Internet Explorer, Firefox, and Safari — offer a "do not track" or "DNT" option that relies on a technology known as a DNT header, which sends a signal to Web sites' visited by the user about the user's browser DNT preference setting. WFI does not currently commit to responding to browsers' DNT signals with respect to the Company's Web sites, in part, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators, including no consistent standard of interpreting user intent. WFI takes privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

### **Public forums, refer a contact, and customer testimonials**

WFI may provide bulletin boards, blogs, or chat rooms on the Company's Web sites. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. WFI is not responsible for the personal information you choose to submit in these forums.

WFI obtains the consent of each Customer prior to posting any information about customer or posting testimonials.

### **Sharing of information collected**

#### **Service Providers**

WFI may share Data about WFI Customers with the Company's contracted service providers so that these service providers can provide services on our behalf. These service providers are authorized to use your personal information only as necessary to provide the requested services to us. Without limiting the foregoing, WFI may also share Data about WFI Visitors with the Company's service providers to ensure the quality of information provided, and with third-party social networking and

media Web sites, such as Facebook, for marketing and advertising on those Web sites. Unless described in this Data Privacy Policy, WFI does not share, sell, rent, or trade any information with third parties for their promotional purposes.

### **WFI Affiliates**

The Company may share Data about WFI Customers with other companies in order to work with them, including affiliates of the WFI corporate group. For example, the Company may need to share Data about WFI Customers with other companies within the WFI corporate family for customer support, marketing, technical operations and account management purposes.

### **Business Partners**

From time to time, WFI may partner with other companies to jointly offer products or services. WFI does not control our business partners' use of the Data about WFI Customers that we collect, and their use of the information will be in accordance with their own privacy policies. If you do not wish for your data to be shared in this manner, you may opt out specifically express interest in a jointly offered product or service.**Third Parties**

WFI does not share, sell, rent, or trade personal data with third parties for their promotional purposes. We do not partner with or have special relationships with any ad server companies.

WFI does use third-party entities to provide valuable services on our behalf. To provide these services to you, we need your explicit consent to share your personal data with them. Third parties with which we share your information are bound by all relevant data privacy laws, terms of confidentiality, and this Data Privacy Policy. For a complete list of these third parties and the services they provide, contact us.

The "Web Site Navigational Information" section of this Data Privacy Policy, specifically addresses the information we or third parties collect through cookies and web beacons, and how you can control cookies through your Web browsers. We may also disclose your personal information to any third party with your prior consent.

### **Compelled Disclosure**

WFI reserves the right to use or disclose information provided if required by law or if the Company reasonably believes that use or disclosure is necessary to protect the Company's rights and/or to comply with a judicial proceeding, court order, or legal process.

### **International transfer of information collected**

The Company primarily stores Data about WFI Customers in Ukraine. To facilitate WFI's global operations, the Company may transfer and access such information from around the world, including from other countries in which the Company has operations. A list of the Company's global offices is available [here](#). This Data Privacy Policies shall apply even if WFI transfers Data about WFI Customers to other countries.

## Communications preferences

WFI offers Customers who provide contact information a means to choose how the Company uses the information provided. You may manage your receipt of marketing and non-transactional communications by clicking on the “unsubscribe” link located on the bottom of the Company’s marketing emails. Additionally, you may unsubscribe [here](#) or by contacting us using the information in the “Contacting Us” section below **Correcting and updating your information**

WFI may retain your information for a period of time consistent with the original purpose of collection. We also may retain your information during the period of time needed for WFI to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

You may request to review, correct, delete or otherwise modify any of the personal information that you have previously provided to us through the Company’s Web sites and Services. If you have registered for an account with WFI, you may generally update your user settings, profile by logging into the applicable Website or Service with your username and password and editing your settings or profile. To update your billing information, discontinue your account, and/or request return or deletion of Your Data associated with your account, please contact your account representative or the customer service team for the applicable Service. For other requests to access, correct, modify or delete Your Data, please review the “Contacting Us” section below. Requests to access, change, or delete your information will be addressed within a reasonable timeframe.

## Security

We follow generally accepted industry standards such as firewalls and encryption and data privacy legal requirements to protect the information submitted to us, both during transmission and after we receive it, against loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no internet or e-mail transmission is ever fully secure or error free. In particular, e-mail sent may not be secure, and you should therefore take special care in deciding what information you send to us via e-mail. Please keep this in mind when disclosing any personal information to us or to any other party via the internet. You hereby acknowledge that we are not responsible for any intercepted information sent via the internet, and you hereby release us from any and all claims arising out of or related to the use of intercepted information in any unauthorized manner.

## Mobile applications

Without limiting the generality of this Data Privacy Policy, in addition to information gathered through its Web sites or submitted to its Services, WFI may obtain information through applications (“Mobile Applications”) that Customers (“Users”) download to and run on their mobile devices (“Devices”). Mobile Applications provided by WFI may obtain information from, or access data stored on, Users’ Devices to provide services related to the relevant Mobile Application. For example, a Mobile Application may: access a camera on a User’s Device to enable the User to upload photographs to the Services; access the telephone book, access the call history on a User’s Device to enable the User to upload that information to the Services; access the geographic location of a User’s Device to enable the User to identify contacts submitted by the User or the Services who are

nearby; or access contact information on a User's Device to enable the User to sync contact information between the information that is stored on the User's Device and the information that is submitted to the Services. Information obtained to provide Mobile Application services may include information obtained in preparation for anticipated updates to those services. Mobile Applications may transmit information to and from Devices to provide the Mobile Application services.

Mobile Applications may provide WFI with information related to Users' use of the Mobile Application services, information regarding Users' computer systems, and information regarding Users' interaction with Mobile Applications, which WFI may use to provide and improve the Mobile Application services. For example, all actions taken in a Mobile Application may be logged, along with associated information (such as the time of day when each action was taken). WFI may also share anonymous data about these actions with third party providers of analytics services. In addition, if a User downloads a WFI Mobile Application after clicking on a third-party mobile advertisement for the Mobile Application or for WFI, the third-party advertiser may provide WFI with certain information, such as the User's Device identification information, which WFI may use to track the performance of its advertising

Customers may configure WFI Mobile Application services, and the information accessed or obtained by the Mobile Application on a User's Device may be affected by the Customer's configuration. In addition, if a Customer use more than one Service from WFI and its affiliates, a Mobile Application may be designed to interoperate with those Services; for instance, to provide a User with access to information from any or all of those Services or to provide information from a User's Device to any or all of those Services. Information accessed or obtained by the Mobile Application on a User's Device may be accessible to the Customer of the Mobile Application. WFI may provide updated versions of its Mobile Applications. If your mobile device's settings permit, those updates will be downloaded and installed automatically on your mobile device. By installing a WFI Mobile Application on your mobile device, you consent to the downloading and updating of that Mobile Application.**Changes to this Data**

## **Privacy Policy**

We reserve the right to modify this Data Privacy Policy at any time, so please review it frequently. If we decide to change our Data Privacy Policy, we will post those changes to this Data Privacy Policy page, to the WFI homepage, and to other places that we deem appropriate so that you are aware of what information we collect, how we use it, who has access to it, and under what circumstances, if any, we disclose it

## **Contact us**

If you feel that this site is not following its stated information Data Privacy Policy, you can contact us at the following address: 18 Office, 89 Pilsudskiego Jozefa St., 50-019 Wroclaw, Poland

## **Questions**

If you have questions or concerns regarding this Data Privacy Policy, please contact us at [policy@walletfactory.com](mailto:policy@walletfactory.com)