

## **Online Privacy Policy**

PaySavi Limited (“PaySavi”) has prepared this Privacy Policy (“Policy”) to outline its online data protection practices. This Policy explains why and what information about you will be collected by PaySavi when you visit this website at [www.paysavi.com](http://www.paysavi.com) and when you contact PaySavi by sending an email, filling in the contact form or otherwise. It also describes how the information about you will be used, how you, as a data subject, can control your personal data and how to get in touch with us. This Policy explains our use of cookies.

Please read this Policy carefully before browsing this website. We will process your data only as described in this Policy. Our website is not directed to children under the age of 16 and we do not knowingly collect personal data from children of this age group. We might update this Policy in the future and please ensure that you read it on a regular basis.

Should you have any questions or comments with reference to this Policy, please contact us at [david@paysavi.com](mailto:david@paysavi.com).

### **What does PaySavi do with your data?**

In light of the EU General Data Protection Regulation (“GDPR”), PaySavi is a controller and a processor of the personal data submitted through this website and collected in other ways. Being a controller means that we are responsible for deciding how we hold and use personal information about you.

### **What data about you do we collect?**

We only collect information about you that is necessary for us to allow you to use the website or contact us, and only to the extent specifically provided in this Policy.

### **Information we obtain from you**

When you contact us via email or via the contact form, you provide us your name, phone number, e-mail address, communication content and data associated with the communication.

### **Information we obtain from your use of our website**

When you visit our website we receive, collect and store any information you enter on our website or provide to us in any other way. In addition, we collect the Internet protocol (IP) address used to connect your computer to the Internet; login; e-mail address; password; computer and connection information and purchase history. We may use software tools to measure and collect session information, including page response times, length of visits to certain pages, page interaction information, and methods used to browse away from the page. We also collect personally identifiable information (including name, email, password, communications), comments, feedback, product reviews, recommendations, and personal profile.

Our website is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to operate our website. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

## **Why do we process your personal data?**

We will only process your personal data where we have a legal basis to do so. The legal basis will depend on the reasons we have collected and need to use your personal data for. We may process your personal data because:

- you have consented to us using your personal data
- we need to comply with a legal obligation
- it is in our legitimate business interests

More specifically, personal data submitted to us through this website and personal data we collected from you or third parties or from public sources will be used for the purposes based on the legal grounds as follows.

## **Communications, based on PaySavi legitimate interest, art. 6 para. 1 f GDPR**

if you have contacted us via this website or otherwise, we may process your personal data to be able to answer your questions, to organise a meeting, call or other communication. Please note that this communication may be recorded and stored by a PaySavi representative in the PaySavi corporate system.

## **Marketing and public relations, based on your consent, art. 6 para. 1 a GDPR**

if you are a visitor of our website, we may, by way of cookies, process your data to carry out marketing research and to analyse the characteristics of this website's visitors, to assess the impact of our marketing communication and to adjust it to the detected tendencies, to plan our future marketing activities, to prepare analytics and profiling for business intelligence, to target our advertising.

## **Business relations, based on PaySavi legitimate interest, art. 6 para. 1 f GDPR**

If you are a representative of our current or potential client, vendor or business partner, we may process your personal data to organise the approval, processing and signing of contracts, acts, invoices and other contractual documentation; to promote our new products, works and services; to confirm the high level of our works and services; to invite you to the meetings and events or organise them; to comply with economic sanctions and export control list screening, industry standards, regulators' requirements and other requirements related to anti-corruption, fraud prevention and anti-money laundering.

## **Corporate and investor relations, based on PaySavi compliance obligations, art. 6 para. 1 c GDPR**

If you are a current or potential director or top manager of PaySavi, we may process your personal data to organise your participation in corporate meetings, events, business trips, to pay your remuneration, to cover related expenses, to maintain our corporate records, to make obligatory public disclosures and reports, to execute auditor's requests, to present the company and its management during the sale process and to perform other legal obligations. We also may share this information within PaySavi, provide some of this data to banks, notary, payroll agencies and legal advisors with the purpose of opening of a corporate bank account or other accounts;

If you are a current or potential affiliate of PaySavi, we may process your personal data to organise your participation in corporate meetings and events, to provide you with the meetings' materials and our reports, to support you in execution of your rights, to make obligatory public disclosures and reports, to execute auditor's requests and to perform other

legal obligations, including anti-money laundering requirements and disclosure of beneficiaries.

## **Security, based on PaySavi legitimate interest, art. 6 para. 1 f GDPR**

If you are a visitor to this website, we may process your personal data to keep this website secure, prevent fraud, protect rights and interests of PaySavi and third parties and protect Intellectual Property rights.

If you are a visitor of our office, we may process your personal data to monitor physical access and to ensure security in our office, as well as to prevent, detect and investigate any crime, misconduct, incident or accident.

## **How can we use your personal data?**

We may process your data by way of collecting, recording, organising, storing, using, structuring, adapting or altering, retrieving, consulting, aligning or combining, erasing or destructing.

We may disclose your data by transmission, dissemination or otherwise making available. To the extent permitted by applicable data protection laws, your personal data may be transferred between various locations of PaySavi and thus processed in the European Economic Area and outside of it, depending on the purpose of processing. Such transfer and processing are possible only as reasonably necessary for the purposes set out in this Policy and within the scope of legitimate interest of PaySavi.

We may disclose your personal data to some of our clients for business engagement or to confirm the high level of skills of our team members to auditors, agencies, supervisory authorities or to other external service providers on “need to know basis” to perform our contractual obligations.

We may also disclose your personal data:

- to the extent that we are required to do so by law;
- in connection with any ongoing or prospective legal proceedings;
- in order to establish, exercise or defend our legal rights, including providing information to others for the purposes of fraud prevention and reducing credit risk.

## How can you control your data?

You, as a Data Subject, have the right to:

- **Request information** about whether we hold personal information about you, and, if so, what that information is and why we are holding or using it.
- **Request access** to your personal information. This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction** of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Withdraw consent.** You have the right to withdraw your consent to the collection, processing and transfer of your personal information for a specific purpose at any time. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law. The withdrawal of consent will not affect the lawfulness of processing based on consent prior its withdrawal.
- If you want to exercise any of these rights, please contact us at [david@paysavi.com](mailto:david@paysavi.com). The request response time is one month.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or to exercise any of your other rights. This is another security measure to ensure that personal information is not disclosed to any person who has no right to receive it. Please exercise your rights wisely and note that abuse of rights may entail your liability.

## How is your data retained?

We make sure to use appropriate technical and physical security measures to protect your personal data which is transmitted, stored or otherwise processed by us, from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access.

We will not retain your data for longer than it is necessary to fulfil the purpose it is being processed for. To determine the appropriate retention period, we consider the amount, nature and sensitivity of the personal data, the purposes for which we process it and whether we can achieve those purposes through other means. We must also consider periods for which we might need to retain personal data in order to meet our legal obligations or to deal with complaints, queries and to protect our legal rights in the event of a claim being made. When we no longer need your personal data, we will securely delete or destroy it.

We will retain information and documents, including electronic documents, containing personal data:

- to the extent that we are required to do so by law
- if the information is relevant to any ongoing or prospective legal proceedings, and
- in order to establish, exercise or defend our legal rights, including providing information to others for the purposes of fraud prevention and reducing credit risk.

## What are Cookies and how do we use them?

When you visit the PaySavi website, PaySavi may place Cookies and similar analytical codes (collectively, "Cookies") on your device, browser or the webpage you are viewing, in order to personalise your experience, understand usage patterns and provide, improve, and secure the PaySavi website. Cookies are simple computer files made of text. Cookies do not typically contain any information that personally identifies someone, but personal data that we store about you may be linked to the information obtained from cookies.

Our websites use different types of Cookies for different reasons, as follows:

- **Functional Cookies** - these Cookies are essential to enable you to move around the PaySavi website and use its features. These Cookies make sure you can view the website and use it in a proper way.

- **Analytical Cookies and other Cookies** - these Cookies help us improve our website, collect anonymous information about how visitors use our website, collect information about the most visited pages and tell us whether and how many error messages were displayed.
- **Third-party Cookies** - these Cookies help third parties to help track and manage the effectiveness of, for example, their websites, ads, number of visitors. More information about these Cookies may be available on the relevant third party's website.
- Based on how long they are valid, the Cookies on the PaySavi website may be either persistent cookies or session cookies: a persistent cookie will be stored by a web browser and will remain valid until its set expiry date, unless deleted by the user before the expiry date; a session cookie, on the other hand, will expire at the end of the user session, when the web browser is closed.

You can adjust your browser settings to delete some of our Cookies or Cookies set by third parties. You may also adjust your browser settings to prevent websites from setting Cookies or third-party Cookies altogether. If you prevent us from setting specific cookies, you may find that some functions are not available or that certain parts of the website will not load.

## **Do you have any questions?**

If you would like to ask something regarding this Privacy Policy, please contact us at [david@paysavi.com](mailto:david@paysavi.com) any time.