

PRIVACY POLICY

1. GENERAL

1.1 Our Privacy policy

Em@ney plc (registered number: C 55558) with its legal office at Regent House, Suite 45 - Triq Bisazza - Sliema SLM1640 – Malta, Europe

("we" or "us") are committed to protecting your information and respecting your privacy.

This Privacy Policy together with the Em@ney Terms of Use (and any other documents referred to therein) set out the basis on which any personal data we collect from you, or which you provide to us, through our website www.emoneyplc.com ("Website") or in connection with your Merchant Account will be processed by us. When you complete any form, speak with our staff or submit any details to us or using our Website, we will collect, use and disclose your personal information in the manner described in this Privacy Policy.

Please read this Privacy Policy carefully to understand our views and practices regarding your personal data, how we use it and how we will treat it. If you do not agree with this Privacy Policy, please do not use our services.

1.2 Changes to this Privacy Policy

Any changes we make to this Privacy Policy in the future will be posted on this page. Any new Privacy Policy will be effective from the time that it is posted on the Website. We reserve the right to make changes to our Privacy Policy at any time, without notice, where such change is required by applicable legislation.

If we are going to use your personal data in a manner that is different from the uses set out below, we will notify you by email. You may object to any new use or change in use of your personal data by contacting us as set out in section 10 (Contact Us) below. We will treat such objection as a notice to terminate the Merchant Account.

2. INFORMATION WE COLLECT

2.1 Information We Collect From You

We may collect and process the following data about you:

- Your full name, address, email address, telephone number, date of birth and bank or payment card details and any proof of your identity and/or address that we may require;
- Details of any bank account (including but not limited to, account holder, account name, account number, sort code, routing number);
- Correspondence that you send us;
- Calls that we make to you or you make to us;
- Surveys that you complete;
- Information collected through cookies;
- Your IP address, log-in times, operating system and browser type;
- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own billing purposes or otherwise and the resources that you access whilst visiting our Website.

2.2 Information We Collect from Third Parties about You

In order to fulfill our legal obligations to prevent fraud and money laundering, we will obtain information about you from third party agencies, including your financial history, court judgments and bankruptcies, from credit reference and fraud prevention agencies when you open an Account and at any time when we feel it is necessary to prevent fraud and minimize our financial risks.

3. AUTHORISATION TO USE YOUR INFORMATION

Merchant authorizes us to use information held in the following ways:

- to operate and administer the Merchant Account and to provide services that Merchant has requested;

- to carry out instructions to make and receive payments and undertake transactions using our services;

- to allow Merchant to participate in interactive features of the Website;
- to notify Merchant about changes to our service(s);
- to improve our internal customer training;
- to comply with financial services regulations including retention of financial information and transactions;
- for financial and identity checks, fraud prevention checks, anti-money laundering and credit checks;
- for customer service, including answering questions and responding to feedback and complaints;
- to enhance the security of our services;
- to provide Merchant with information, products or services that are requested from us or which we feel may be of interest.

4. SECURITY AND RETENTION

4.1 Security

We are committed to ensuring that your information is secure. To prevent unauthorized access or disclosure of information we have physical, electronic and managerial procedures in place to keep your information safe. Communication with our merchant console is securing using SSL technology with high-security encryption by DigiCert High Assurance.

However, this high level of protection can only be effective if you follow certain security practices yourself. You must never share your Merchant Account or login details with anyone. If you are concerned that any of your login details have been compromised, you can change them any time once you are logged on but you should always also immediately contact Customer Services and tell us why you think your login details have been compromised. Details of how to contact Customer Services are available from the "Contact" section of the Website.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

4.2 Retention

We are by law required to retain certain records for a period of at least five years after closure of your Merchant Account which will include your personal data such as your name, contact details, customer number and transaction history etc. Otherwise, we will delete and destroy all personal data that we hold about you when you (or we) terminate your Merchant Account.

5. DISCLOSURE OF YOUR INFORMATION

5.1 Group Companies

We may disclose your personal information to any member of our group, which means our ultimate holding company and its subsidiaries who are based in different countries. This may be necessary in order to, among other things, fulfill your request, process your payment details and transactions, provide support services and monitor fraudulent activities.

5.2 Fraud and Credit Reference Agencies

When you open a Merchant Account, at intervals of up to every 6 months and at any other time we feel it is necessary to do so to protect our financial interests and prevent money-laundering or fraud, we share certain information about you and your Merchant Account, financial history and transactions as part of our normal business operations with our identity verification service providers and credit reference agencies to identify and verify users, to limit our exposure to fraud and other criminal activities and to manage our financial risk.

5.3 Other Disclosures

We may also disclose your personal information to:

- a prospective buyer of our business or a buyer of a substantial number of the shares in our business;
- the police, other lawful enforcement body, regulatory body or court if we are under a duty to disclose or share your personal data, or to protect the rights, property, or safety of ourselves or our group companies, our customers, or others;
- third parties who referred you to us initially and to whom we owe a commission payment as a result of the referral. Where the commission payment is based on transaction volumes, numbers or types of transactions, we may share that information with that third party.

6. COMMUNICATING WITH YOU

We may contact you by email to the primary email address registered with your Merchant Account or by telephone to the contact telephone numbers you have provided when registering for your Merchant Account. You can change your primary email address and/or contact telephone number at any time, subject to the provisions of section 8 below.

You may also receive system-generated transactional emails such as confirmation of uploads, notification of receipt of payments, notification of password changes etc. which are necessary for the proper operation and administration of your account.

6.1 Newsletters and Marketing

As a Merchant Account holder, you will occasionally receive information by email from us, unless you have chosen not to receive such communication, and if you have consented to do so from our group companies too, about products, services and special deals which we think will be of interest to you via our newsletter. You can change whether or not you receive newsletters from us and our group companies in any newsletter email by clicking on the appropriate 'opt-out' link. Please note that you will still receive communication regarding your Merchant Account.

From time to time we do share aggregated information about our customers' use of our website and services with other companies for research and analysis purposes, but you cannot be identified from this aggregated information.

6.2 Phishing

Phishing is the name given to attempts to steal personal details and financial account details from a website user. "Phishers" use fake or "spoof" emails to lead users to counterfeit websites where the user is tricked into entering their personal details, such as credit card numbers, user names and passwords. WE WILL NEVER SEND EMAILS ASKING YOU FOR SUCH DETAILS AND OUR STAFF WILL NEVER ASK YOU FOR YOUR PASSWORD.

If you do receive such an email or are asked for your password by anyone claiming to work for us please forward the email or report the incident by email to our Customer Services.

7. LINKS TO OTHER WEBSITES

Our Website may, from time to time, contain links to and from the websites of our partner networks. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

8. ACCESSING AND UPDATING YOUR INFORMATION

If your personal details (such as your name, address, or telephone number) change you must update your details by contacting Customer Services via the "Contact" section of the Website as soon as you can. We shall not be liable for any loss arising out of your failure to keep your personal details up to date.

You have the right to access information that we

hold about you. To do so, please contact us at the address given at the end of this policy. Access may be subject to a fee of up to £10.

9. COOKIES

9.1 General

A cookie is a small amount of data which contains information that is downloaded to the device from which you access our site. Cookies are useful because they allow us and other websites to recognize your device.

Cookies are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. For example, they can allow you to navigate between web pages of our site and remember your preferences such as your language selection.

9.2 Types of Cookies and Consent

In order to comply with legislation, we have reviewed the use of cookies on our site and set out the information below. This is to ensure that you are aware of these cookies and are able to give your consent for the placing of some or all of these cookies on your device when you use our site.

In summary, we use the following types of cookies:

- Strictly necessary cookies – These are cookies which are essential for our site to operate such as those which identify you so you can log into your Merchant Account. They allow you to move around our website and use the services you have

requested. These cookies will be activated when you enter our site and as you use our site.

- Compliance cookies – These include cookies which are necessary to assist in meeting our regulatory compliance obligations, such as anti-money laundering and anti-fraud obligations, and prevent your Merchant Account from being hijacked. These cookies will be activated when you enter our site and as you use our site.

- Performance cookies – These are cookies that help us to improve how our site works and to deliver a better service to you. For example, they will assess which pages you visit most often or if you get an error message. All information collected by these cookies is aggregated and therefore anonymous.

- Functionality cookies – These cookies allow us to deliver a more personalized service to you and allow our site to remember choices you have made such as the language you prefer or the region you are in.

- Third Party cookies – When you visit a page on our site with content embedded from third parties, for example, YouTube or Twitter, cookies may be downloaded onto your device. We do not set or control these cookies. If you are concerned about the types of cookies that may be downloaded you check the third party websites for more information about these cookies.

We may use other cookies from time to time in

accordance with this policy. By using our sites and other online services, you acknowledge that we may use some or all of the cookies as set out above and you agree that we can place Performance and Functionality Cookies on your device when you use our site. If you do not agree to this you should cease using our sites and online services or adjust your browser settings. Please see section 9.3 below.

9.3 Blocking Cookies

Should you wish to continue using our services but restrict our use of cookies, you can block cookies by activating the setting on your browser which allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including strictly necessary and/or compliance cookies, as set described above) you may not be able to access all or parts of our site. Our site may issue some of the cookies described above as soon as you visit our site unless you have adjusted your browser setting so that it will refuse cookies.

10. Contact Us

Questions, comments and requests regarding this Privacy Policy are welcomed and should be addressed to email: contact@emoney.com.mt