

# PRIVACY POLICY

CALYPSO PAY LTD (“CALYPSO PAY LTD ” or, “us”, “our”, “we”) is the creator and owner of software for payment solutions (the “Solution”). We recognise and respect the importance of maintaining the privacy of our customers (each a “Customer”) as well as our Customers’ end users, using Customer’s website or mobile application (“App”), in which the CALYPSO PAY LTD code required to implement the Solution in Customer’s App (each an “End User”) has been integrated. This Privacy Policy describes the types of information we collect from you when you visit and use our website (“Site”) and/or use the Solution and associated code, documentation and services provided by CALYPSO PAY LTD in respect of the Solution (“Services”). This Privacy Policy also explains how we may process, transfer, store and disclose the information collected, as well as your ability to control certain uses of the collected information. CALYPSO PAY LTD is the data controller in respect of the processing activities outlined in this Privacy Policy relating to information collected and/or provided by users through the Site and the data processor relating to any information provided by a Customer relating to its End Users. The Customer is the data controller in respect of processing activities outlined in this Privacy Policy relating to any information provided by a Customer relating to its End Users. “You” means any adult user of the Site or Services, using the Site or Services on behalf of an entity, individual or yourself or any parent or guardian of any minor whom you allow using the Site (as defined below) or Services, and for whom you will be held strictly responsible.

## Privacy policy key points Personal Information We Collect.

When contact us through the Site, we collect Personal Information provided by you, such as your name, email address, information regarding your (requested) use of the Services and title. We also collect information about your use of the Services and our Customers’ End Users (including as provided by the Customer). If you contact us for questions or complaints, we will collect the information related to your inquiry.

## Basis for Processing Your Personal Information.

Processing your Personal Information is necessary for the provision of the Site and Services to you. Processing for the purposes of developing and enhancing our products and Services, for analytics and usage analysis, for fraud prevention and security and for our recordkeeping and protection of our legal rights - are all necessary for the purposes of legitimate interests that we pursue.

## How We Use the Information We Collect.

We use the information (including Personal Information) we collect mainly to administer and provide the Site and Services, contact you with administrative information and improve the Site and Services.

**Sharing the Personal Information We Collect.** We may share the Personal Information we collect with our service providers and subcontractors who assist us in the operation of the Site and Services and process the information on our behalf and under our instructions, as well as with the specific Customer through which an End User is using our Services. We may share your information with any third party that you instruct us to provide such information with. You hereby warrant that any such instructions and transfer shall be in accordance with applicable law, including about international transfer. [add warranty of Merchant that instructions will be in accordance with applicable law also add to DPA, TOs and Services agreement - also in template].

#### Your Rights.

Subject to applicable law and additional rights as set forth below, you may have a right to access, update and/or delete your Personal Information and obtain a copy of the Personal Information we have collected about you.

**Use of Cookies.** We use cookies to help personalize your experience. You can adjust your settings to determine which cookies you do or do not allow. Changing your settings and/or deleting existing cookies may affect the Services.

#### Retention.

We retain information for as long as necessary for the purposes set forth in this Privacy Policy.

#### Security.

We implement industry standard measures aimed at reducing the risks of damage and unauthorized access or use of Personal Information, but they do not provide absolute information security.