

## PRIVACY POLICY

(“XPRESS CASHBACK”, “Company”, “we”, “us”, “our”) shall handle and store personal data provided in the manner described herein. This **privacy policy** summarizes what types of information we might collect from a registered user or other visitor (“you”), and what we will and will not do with the information collected.

This privacy policy sets out how XPRESS CASHBACK uses and protects any information that you give XPRESS CASHBACK when you use this website. If you continue to browse or use this website you are agreeing to comply with and be bound by the following privacy policy, which together with our Terms and Conditions govern XPRESS CASHBACK's relationship with you in relation to this website.

This privacy notice applies to any XPRESS CASHBACK website, application, service, or tool (“**Services**”) where this privacy notice is referenced, regardless of how you access or use them, including through mobile devices.

Please note that this privacy policy does not govern the collection and use of information by companies that we do not control, nor by individuals not employed or managed by us. If you visit a website that we mention or provide a link to, be sure to review its privacy policy before providing the site with information.

Submission of the personal data to Company by you denotes consent with this privacy policy and its provisions. Anyone not willing to consent with this privacy policy should either refrain from using the Website or contact Support with request for specific treatment of their Personal Data (“**Personal Data**” means all information about personal details transferred to the Company upon registration or in further communications with and usage of Company Website and its Services. Agreeing to such specific treatment is solely at Company discretion).

### **Personal Data Collection and Usage**

We are collecting your personal data to comply with the requirements of the international policy of "Know Your Customer" and "Anti Money Laundering and Fighting Against Terrorism" legislation. It is always up to you whether to disclose personal information to us, although if you elect not to do so, we reserve the right to refuse to provide you with any products or services. The amount of your personal data collected depends on the product or services in which you are interested.

Data collected includes but is not limited to:

- 1.1 Personal data such as date of birth, first and last name, residential address, e-mail, phone number, identification documents, IP address and device used for accessing Company Website and any other additional information provided by filling out registration forms or in any further liaison with the Company.
- 1.2 Contents of correspondence with the Company over Website communication facilities, e-mail, phone or any other means
- 1.3 Details of financial transactions with the Company;
- 1.4 History of Company Website access such as location data, logs and other Website

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usage statistics.

Data collected from you may be used by Company for the following purposes:

- 1.5 To authenticate and identify you on our Website and applications so we can provide you with the services you request;
- 1.6 For 'analytical' purposes such as to keep track of user/customer browsing patterns on the Website and to build up a profile for a customised browser experience for you;
- 1.7 To deliver adverts and information more relevant and to you and your interests;
- 1.8 Compliance reporting if required by regulating authorities;
- 1.9 Executing our procedures for preventing money laundering, fraud and cheating;
- 1.10 Analysis, research and development;
- 1.11 Market research;
- 1.12 And any other purpose which is necessary for the performance of our contractual obligations to you.

#### **Personal information collected from other sources**

We allow you to use social media sites to create your account or to connect your account with the respective social media site. Those social media sites may give us automatic access to certain personal information retained by them about you. You control the personal information you allow us to have access to through the privacy settings on the applicable social media site and the permissions you give us when you grant us access to the personal information retained by the respective social media site about you. By associating an account managed by a social media site with your account and authorizing us to have access to this information, you agree that we can collect, use, and retain the information provided by these social media sites in accordance with this privacy policy.

#### **Personal Data processing**

Your personal data will be processed by our staff who are specifically trained and authorised to process them.

Your personal data will also be transmitted to third parties that we use to provide our services; these subjects have been adequately selected and offer a guarantee of compliance with the rules on the processing of personal data. These persons have been appointed as data controllers and carry out their activities according to the instructions given by us and under our control.

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The third parties in question belong to the following categories: banking operators, internet providers, companies specialising in IT and telematic services; couriers; companies that carry out marketing activities; companies specialising in market research and data processing.

### **Data Usage and Storage**

We require this information to provide you with a better and tailored state-of-the-art service, and for the following reasons:

- Internal record keeping.
- Providing customer service.
- Promotional emails.
- Detect, prevent, mitigate, and investigate fraudulent or illegal activities.

Company undertakes to carry out all reasonable measures and employ current industry in software and hardware architecture, methods, and procedures to securely store and safeguard Personal Data. For data analysis, compliance reporting purposes and any inquiries, Company reserves right to store Personal Data even if your account was closed for period not exceeding five (5) years.

We may store your data on servers provided by third party hosting vendors with whom we have contracted.

We follow industry standards to protect the personal information submitted to us. No method of transmission over the Internet, or method of electronic storage, is completely secure. Therefore, while we use commercially acceptable means to protect your personal information, we cannot guarantee its absolute security.

### **Data sharing**

We may disclose your personal information to third parties. This disclosure may be required for us to provide you access to our Services, to comply with our legal obligations, to facilitate our marketing and advertising activities, or to prevent, detect, mitigate, and investigate fraudulent or illegal activities related to our Services. We attempt to minimize the amount of personal information we disclose to what is directly relevant and necessary to accomplish the specified purpose.

### **Your Rights in relation to your Data**

You have the right to request information that Company stores about you. Company reserves the right to charge fee covering effort of employees to prepare information report. The request for the information may be sent by email, fax or registered mail.

Therefore, you have the following rights:

- to access personal data;
- if necessary, to modify, add or delete any personal data stored;
- to transfer personal data from us to another controller, if it is technically possible;
- to object to the processing of personal data or to make us restrict processing in accordance

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with the requirements of the applicable regulatory enactments;

-not to be subject to fully automated decision making, including profiling, if taking such a decision has legal effects or a similar considerable effect on the data subject;

- at any time to withdraw the consent given to us for the processing of personal data.

### **Update/Amendment of Personal Information**

You have the right to review the data already submitted to the Company by logging in into Personal Page. In case of any changes to the Personal Information submitted, it is your obligation to update/correct the information by sending a request to Customer Support.

### **International Data transmission**

Due to Company product infrastructure and offering, certain data transmissions might be done internationally. Some of the Data recipients may be placed outside EEA. Company undertakes to carry out all reasonable efforts to ensure security of data over such transmissions.

### **Cookies and similar technologies**

We use cookies, web beacons (or pixels), unique identifiers, and similar technologies to collect information about the pages you view, the links you click, and other actions you take when using our Services, within our advertising or email content.

We use Google Analytics which is a web analysing tool of Google Inc. for the purposes of the adequate design and continuous optimization of our website. Google Analytics works with cookies and creates pseudonymised usage profiles, which enable an analysis of your use of our website.

Cookies are text-only strings of information that Company website uses to collect specific information. They are downloaded to your computer or mobile device upon visiting Company website. Cookies are then sent back to the Company website on each subsequent visit.

Cookies serve several purposes generally enhancing your experience on the Website. Benefits of cookies include helping to navigate Website more efficiently, memorizing preferences, and improving overall user experience. Company uses cookies for tracking referrals that brought you to Website as well as analysis of your preferences, gathering statistics and making Website more responsive.

There is an option to delete previously stored cookies or block them from tracking browsing patterns. It is communicated, however, that prevention of cookies operation impairs user experience and impedes proper functioning of the Website. If you set up your Web browser (for example, Internet Explorer or Firefox) so that cookies are not allowed, you might not be able to use some or all the features of our Web site(s).

### **Enquiries**

If you have any questions regarding this Privacy Policy or any questions about the usage of your personal information, please e-mail our Customer Support.

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## **Revision and Changes**

We reserve the right to change this privacy policy as we deem necessary or appropriate because of legal compliance requirements or changes in our business practices. If you have provided us with an email address, we will endeavour to notify you, by email to that address, of any material change to how we will use personally identifiable information.