



NOTION PAYMENTS LTD.

Privacy Policy

Notion Payments Ltd

July 2024

Introduction

This Privacy Policy of **Notion Payments Ltd** (the “**Company**” or “**we**”) governs the Company’s principles and standards in relation to how we collect, use, disclose, and safeguard your information in accordance with the Personal Information Protection Act (PIPA) [SBC 2003] Chapter 63, and other relevant privacy laws in British Columbia, Canada.

As a money service business in Canada, the Company ensures it is fully compliant with Canadian legislation. The Company respects and adheres to the international, foreign, and domestic laws applicable to its business.

Our expectations towards our employees and business partners

All employees, whether temporary, fixed-term, or permanent, and management of the Company, must comply with the Company’s Privacy Policy, regardless of their position and location. This Privacy Policy also applies to all third parties, whether contractors, seconded staff, trainees, acting under the contractual responsibility of the Company.

This Privacy Policy is equally binding for all employees and contracted third parties.

Our senior management is responsible for ensuring that this Policy is fully applied and communicated to our team members and third parties engaged by the Company.

We do not tolerate any illegal activities and expect our business partners to meet the same principles we demand from ourselves.

Notion Payments Ltd Business

The Company is an authorized electronic money institution in Canada. It offers both individuals and businesses the following financial solutions:

- Currency exchange services;
- Issuing and processing debit, credit, business, and pre-paid payment cards;
- Money services/internet-based payment services (Money transfers);
- Dealing in virtual currencies.

Geography of our Services

The geography of our services encompasses the following countries and regions: the European Countries and countries within the European Economic Area (EEA), Canada, African Countries, Middle East and North African countries (MENA), Gulf Cooperation Council countries (GCC), CIS countries, Southeast Asian countries (SEA), Latin American countries (LATAM), excluding the United States of America.

Changes

We may periodically review and update this Policy and other guidance to meet the highest standards and to comply with local, regional, and international regulatory requirements.

1. Overview

The Company places a high priority on the privacy and integrity of the personal information of our Clients, both present and future. The Company strives to ensure the safety and confidentiality of all information received from the Client. This Privacy & Internal Privacy Controls Policy (the "Policy") describes how the Company collects, uses and protects the personal information of the Client.

By registering an account for the provision of the Company's services, the Client confirms by an affirmative action that he/she read and accepted the content of this document and, thus, confirms that consent is given for the processing of certain personal information for the purposes of using the Company's services through the Company's System(s).

We ask that you read this privacy notice carefully as we would like to inform you that your privacy on the internet is of crucial importance to us, and the policy also contains important information on who we are; how and why we collect, store, use and share personal information; your rights in relation to your personal information and on how to contact us if you have a complaint.

2. Privacy Policy & Policy on Internal Privacy Controls

The Company, acting as 'controller' of personal data, routinely collects personal, confidential and sensitive non-public information ("Non-Public Information") from its Clients that are necessary to administer its business and carry out its regulated activities in an effort to provide Clients with superior service.

The provision of certain personal information is required from you to enable us to provide our services upon registration of an account:

- Personal information such as your first name and surname, national identification number, e-mail address, and phone number
- Financial Information, experience and employment information for assessing appropriateness will also be collected.

The types of data we collect, along with the purpose for collection, are listed below:

Personal data type:	Purpose:
Personal information such as first and surname, date of birth and address.	To meet our anti-money laundering (AML) and other regulatory obligations in relation



	to Know Your Client (KYC) and client due diligence. To verify your identity using our verification processes.
Contact information (e-mail address and phone number).	In order to enable communication with you in relation to the services provided and to fulfill our regulatory and compliance obligations.
Employment information, financial information, relevant education and experience information.	In order to comply with KYC and AML obligations.
Ethnicity, citizenship and social security numbers or national identity and passport numbers .	In order to comply with KYC and regulatory reporting and other AML obligations.

The Company is committed to safeguarding this information so that its confidentiality can be maintained and the unauthorized access/use or unnecessary disclosure of this information can be prevented.

If the Client does not wish the Company to process Non-Public Information, the Client should inform the Company in writing. It is noted, however, that if the Client wishes to opt out, the Company may not be able to continue providing information, services and products requested by the Client, and the Company shall have no liability to the Client in this regard.

The Company will not use or disclose Non-Public Information for any purpose other than for the performance of business activities or if required by law.

This Policy describes how the Company protects and handles the Non-Public Information it collects on customers who apply for or receive its products and services. The provisions of this policy apply to current, former and prospective customers of the Company.

3. How We Use Your Non-Public Information

We use information held about you in the following ways:

- To ensure that the content on our website is presented to you in the most effective manner and to improve the content of our website
- To communicate with you, contact you and provide you with products and services that you request from us or, where you have indicated to be contacted, for products and services that we feel may be of interest to you
- To manage and administer the products and services provided to you
- To keep you updated as a Client in relation to changes to our services and relevant matters



NOTION PAYMENTS LTD.

- To provide, improve, test and monitor the effectiveness of our Services.
- To develop and test new products and features.
- To monitor metrics, such as the total number of visitors, traffic and demographic patterns
- To diagnose or resolve technology problems
- To carry out our obligations arising from any contracts entered between you and us.
- We may also use your data or permit select third parties and our processors to use your data to provide you with information about goods and services that may be of interest to you, and they or we may contact you about these by e-mail.
- To notify you about updates to the website.
- To send out newsletters or information about other opportunities that we believe will be of interest to you. We will only send this to you if you have indicated that you wish to receive such information, and we will respect your wish not to do so if you communicate such a wish to us. You can opt out of receiving marketing communications at any time if you do not wish to receive such marketing material by clicking "unsubscribe".
- To promote safety and security. We use the information we have to help verify accounts and activity and to promote safety and security on our regulated services, such as by investigating suspicious activity or violations of our terms or policies. We work hard to protect your account using teams of IT specialists, automated systems, and advanced technology such as encryption.

4. Retention of Records

The Company will keep personal data only as long as it is necessary, including for the purposes of updating the product or services or as required by law for audit trail purposes.

When the personal data is no longer required, it will be destroyed either by shredding or other approved destruction methods to prevent unauthorized parties from gaining access to the information during and after the process.

We will safeguard information in our custody.

We have developed and will maintain security procedures to safeguard personal data against loss, theft, copying and unauthorized disclosure, use or modification. Access to personal data is restricted to employees and authorized service providers who need it to perform their work.

5. Cookies

Cookies are small pieces of information sent by a web server to store on a web browser so it can be read back later from that web browser. They are used to help your browser remember your choices and display the correct information for you - such as items in your basket - and not treat you as a new visitor each time you visit a page. Cookies may be used on some pages of the Site for us to provide Site users with a more customised web browsing experience in a way that we will be able to distinguish you from other users of our Site.



NOTION PAYMENTS LTD.

Some cookies are only set for the duration of your visit ("session cookies") to navigate and provide you with relevant information. Others are set for longer periods ("persistent cookies") so that your browser can remember your choices from a previous visit. The cookies stored cannot harm your device and are anonymous and unique to your browser.

You can choose to disable or block these cookies in your browser, but without some of them, our Site may not work.

6. The Protection of Non-Public Information

The Company takes the issue of security very seriously and ensures that all possible measures to ensure the security of your confidential information, including adhering to strict standards for the internal use of confidential information and using leading data storage technology.

When or if making a payment with a credit/debit card, the Client will be transferred to the Site of the processing centre, where a form has to be filled in. To prevent the unauthorized use of your credit/debit card, the card information of the Client is transmitted to the Company in a shortened form and through a secure server. In certain exceptional circumstances, the Company may refund payments made by credit or debit card. In this case, the funds will be refunded to the card that was used for the deposit

We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality.

The Company may occasionally share Non-Public Information with its affiliates or third-party service providers and joint marketers not affiliated with the Company. This information may be shared for a variety of purposes, such as to support the financial products and services provided to Clients, to service Client Accounts, to cooperate with regulatory authorities and law enforcement agencies, to comply with court orders or other official requests, or, as necessary, to protect the Company's rights or property.

7. Your Consent

By registering a account and accessing our Site and our System(s), you accept this Privacy Policy, and you consent to the Company collecting, maintaining, using and disclosing your Personal Data in accordance with the terms of this Policy.

8. Queries & Complaints

We hope that our Data Protection Officer, client support or compliance team can resolve any query or concern you raise about our use of your information.

If you have privacy questions that are not answered by this Privacy Policy or any other concerns about how we use your personal data, please write to us via our contact us page.