

# PRIVACY NOTICE

**Last updated January 01, 2018**

Thank you for choosing to be part of our community at eBit System Limited (“company”, “we”, “us”, or “our”). We are committed to protecting your personal information and your right to privacy. If you have any questions or concerns about our policy or our practices with regards to your personal information, please contact us at [help@ebit-payment-ico.com](mailto:help@ebit-payment-ico.com).

When you visit our website <https://ebitsystem.io>, mobile application, and use our services, you trust us with your personal information. We take your privacy very seriously. In this privacy notice, we describe our privacy policy. We seek to explain to you in the clearest way possible what information we collect, how we use it and what rights you have in relation to it. We hope you take some time to read through it carefully, as it is important. If there are any terms in this privacy policy that you do not agree with, please discontinue use of our Sites or Apps and our services.

This privacy policy applies to all information collected through our website (such as <https://ebitsystem.io>), mobile application, ("**Apps**"), and/or any related services, sales, marketing or events (we refer to them collectively in this privacy policy as the "**Sites**").

**Please read this privacy policy carefully as it will help you make informed decisions about sharing your personal information with us.**

## 1. WHAT INFORMATION DO WE COLLECT?

### **Personal information you disclose to us:**

- The information you give us "Submitted Information": This is information you give us about you by filling in forms on the App and/or the Site, or by corresponding with us (for example, by e-mail or via the chat functions on the App and/or the Site). It includes information you provide when you register to use the App, download or register the App, subscribe to any of our services, enter into any transaction on the App or the Site (such as a Buying eBits, Instant Transfer, Electronic currency/cryptocurrency Exchange), participate in discussion boards or other social media functions on the App or the Site, enter a competition, promotion or survey and when you report a problem with an App/via email, the Services, or the Site. If you contact us, we will keep a record of that correspondence. The information you give us may include your name, address,

date of birth, e-mail address, phone number, the Device's phone number, username, password and other registration information, financial, details of your bank account including the bank account number, bank sort code, IBAN, details of your debit and credit cards including the long number, relevant expiry dates and CVC, identification document numbers, copies of identification documents (for example, passport, driving licence and utility bill) personal description and photograph and any other information you provide us in order to prove your eligibility to use our services.

- Information we collect about you and your device. Each time you visit the App or our Site we will automatically collect the following information:
  - technical information, including the internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device information and the type of mobile device you use, a unique device identifier (for example, your Device's IMEI number, the MAC address of the Device's wireless network interface, or the mobile phone number used by the Device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting "Device Information";
  - information about your visit, including the full uniform resource locators (URL), clickstream to, through and from our site (including date and time), page response times, services you viewed or searching for, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, device information;
  - transaction information including date, time, amount, currencies used, exchange rate, beneficiary details, details and location of the merchant or ATMs associated with the transaction, IP address of sender and receiver, sender and receiver's name and registration information, messages sent or received with the payment, device information used to facilitate the payment and the payment instrument used;
  - information stored on your Device, including if you allow eBit System access contact information from your address book, login information,

photos, videos or other digital content, check-ins (Content Information).

The App will periodically recollect this information in order to stay up-to-date;

- details of your use of our App or your visits to our Site including transaction details relating to your use of our services, including who you have sent money or electronic money to, foreign exchange transactions you have entered into, the time, date and location of the place the transaction was entered into.
- Location Information. We use GPS technology and your IP address to determine your location – this may be used when the App is running in the foreground and the background of your Device. This is used to prevent fraud, for instance, if your mobile phone is saying that you are based in the UK but your card is being used to enter into an ATM Withdrawal or point of sale purchase in Spain, we may not allow that transaction to be processed. Our card protection and fraud-prevention measures require this personal data for the feature to work. If you wish to use the particular feature, you will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling location permission for the eBit System App within your device settings "Location Information".
- Information to help us deliver our service to you. We work closely with third parties in order to help us deliver our Service to you. These third parties are business partners (such as those we partner with to offer additional eBit System Services like credit), subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, fraud prevention agencies, customer service providers and developers. Information we may collect about you from such parties can include credit search information, information which helps us to verify your identity or information relating to your payment transactions. Please see the 'Disclosure of your Information' section for more information.
- In a later date, if you allow us to, we will collect friends lists from Facebook and similar information from other third parties such as Twitter and Google

– the App will periodically re-collect this information in order to stay up-to-date.

***In Short:** We collect personal information that you provide to us such as name, address, contact information, passwords and security data, payment information, and social media login data.*

We collect personal information that you voluntarily provide to us when registering at the Sites or Apps, expressing an interest in obtaining information about us or our products and services, when participating in activities on the Sites or Apps or otherwise contacting us.

The personal information that we collect depends on the context of your interactions with us and the Sites or Apps, the choices you make and the products and features you use. The personal information we collect can include the following:

**Name and Contact Data.** We collect your first and last name, email address, postal address, phone number, and other similar contact data.

**Credentials.** We collect passwords, password hints, and similar security information used for authentication and account access.

**Payment Data.** We collect data necessary to process your payment if you make purchases, such as your payment instrument number (such as a credit card number), and the security code associated with your payment instrument. All payment data is stored by our payment processor and you should review its privacy policies and contact the payment processor directly to respond to your questions.

**Social Media Login Data.** We provide you with the option to register using social media account details, like your Facebook, Twitter or other social media account. If you choose to register in this way, we will collect the Information described in the section called "HOW DO WE HANDLE YOUR SOCIAL LOGINS" below.

All personal information that you provide to us must be true, complete and accurate, and you must notify us of any changes to such personal information.

### **Information automatically collected**

***In Short:** Some information – such as IP address and/or browser and device characteristics – is collected automatically when you visit our Sites or Apps.*

We automatically collect certain information when you visit, use or navigate the Sites or Apps. This information does not reveal your specific identity (like your name or contact information) but may include device and usage information, such as your IP address, browser and device characteristics, operating system, language preferences, referring

URLs, device name, country, location, information about how and when you use our Sites or Apps and other technical information. This information is primarily needed to maintain the security and operation of our Sites or Apps, and for our internal analytics and reporting purposes.

Like many businesses, we also collect information through cookies and similar technologies.

### **Information collected through our Apps**

***In Short:** We may collect information regarding your geo-location, mobile device, push notifications when you use our apps.*

If you use our Apps, we may also collect the following information:

- *Geo-Location Information.* We may request access or permission to and track location-based information from your mobile device, either continuously or while you are using our mobile application, to provide location-based services. If you wish to change our access or permissions, you may do so in your device's settings.
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- *Mobile Device Access.* We may request access or permission to certain features from your mobile device, including your mobile device's camera, contacts, social media accounts, storage, sensors, SMS messages, and other features. If you wish to change our access or permissions, you may do so in your device's settings.
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- *Mobile Device Data.* We may automatically collect device information (such as your mobile device ID, model, and manufacturer), operating system, version information and IP address.
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- *Push Notifications.* We may request to send you push notifications regarding your account or the mobile application. If you wish to opt-out from receiving these types of communications, you may turn them off in your device's settings.
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### **Information collected from other sources**

***In Short:*** We may collect limited data from public databases, marketing partners, social media platforms, and other outside sources.

We may obtain information about you from other sources, such as public databases, joint marketing partners, social media platforms (such as Facebook), as well as from other third parties. Examples of the information we receive from other sources include: social media profile information (your name, gender, birthday, email, current city, state and country, user identification numbers for your contacts, profile picture URL and any other information that you choose to make public); marketing leads and search results and links, including paid listings (such as sponsored links).

## **2. HOW DO WE USE YOUR INFORMATION?**

We use information held about you in the following ways:

Submitted Information: We will use this information so that we can:

- carry out our obligations arising from any transactions you enter into with us, for example, Top Ups, Instant Transfers, eBit System Bank Transfers, Electronic Currency /cryptocurrency Exchanges, ATM Withdrawals and eBit System Card Purchases and to provide you with the information, products, and services that you request from us;
- provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. Please see the section on 'Third Party Services' below for more information;
- verify your identity to protect against fraud, comply with financial crime laws and to confirm your eligibility to use our products and services;
- announce you about changes to our service;
- facilitate social interactions through our services and to make you aware if any of your contacts who are eBit System Users and have location services enabled, are in the same area as you. You can switch off location services in relation to this feature in the privacy settings of the payments section of the eBit System App;
- make you aware if any of your contacts who are eBit System Users have utilized any of eBit System products or features. You can ask us to stop sending you marketing

pushes at any time by adjusting your marketing preferences via the privacy section of the eBit System App;

- and to ensure that content from our site is presented in the most effective manner for you and for your computer.

Device Information: We will use this information so that we can:

administer our Site and the App for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

- to improve our Site and the App to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service when you choose to do so;
- as part of our efforts to keep our Site and the App safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our Site and the App about goods or services that may interest you or them;
- to protect against fraud, verify your identity, comply with anti-financial crime laws and to confirm your eligibility to use our products and services;
- to comply with our regulatory obligations.

Location Information: We will use this information so that we can:

- deliver relevant advertising to you, for example, information on nearby merchants
- protect against fraud;
- make you aware if any of your contacts, who are eBit System Users and have location services enabled, are in the same area as you. You will be able to switch off location services in relation to this feature in the privacy settings of the payments section of the eBit System App.

Third Party Information: We will combine this information with information you give to us and the information we collect about you. We will use this information and the combined information:

- to help us better understand your financial circumstances and behavior so that we may make decisions about how we manage your eBit System Account;
- to process applications for products and services available through us including making decisions about whether to agree to approve any applications;
- for the purposes set out above (depending on the types of information we receive).

We may associate any category of information with any other category of information and will treat the combined information as personal data in accordance with this policy for as long as it is combined.

For example, we may use credit reference agencies to carry out credit searches on you, so that, when you apply for credit products or when we suggest credit products to you via the eBit System App, we will be able to tailor our credit offering to your needs. The use of credit reference agencies and fraud prevention agencies is not limited to such agencies based in the United Kingdom and includes such agencies overseas. Any such search under this section may leave a footprint on your credit file. You acknowledge that we may carry out such credit search in the knowledge that it may leave a footprint on your credit history. We do not allow joint account holders, however, in certain circumstances, credit reference agencies may link your record with your spouse, partner or other financial associates. In certain circumstances, you are entitled to access your personal records held by credit and fraud prevention agencies. If you would like details of the credit reference and fraud prevention agencies from which we have obtained or may obtain information about you, please contact us via support. You can withdraw your consent to be credit searched at any time by contacting a member of our support team via our in-App chat function.

If we decide to engage advertisers to promote our products and services, the advertisers and their advertising networks may require anonymized personal data to serve relevant adverts to you and others. We will never disclose identifiable information about individuals to advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help our advertising partners provide a tailored and targeted campaign, relevant for a subsection of our users (for example, women in Paris). In some instances, we may use personal data we have collected from you to enable our advertising partners to display their advertisement to their target audience.

***In Short:*** *We process your information for purposes based on legitimate business interests, the fulfillment of our contract with you, compliance with our legal obligations, and/or your consent.*

We use personal information collected via our Sites or Apps for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests ("Business Purposes"), in order to enter into or perform a contract with you ("Contractual"), with your consent ("Consent"), and/or for



compliance with our legal obligations ("Legal Reasons"). We indicate the specific processing grounds we rely on next to each purpose listed below.

We use the information we collect or receive:

- **To facilitate account creation and login process** with your Consent. If you choose to link your account with us to a third party account \*(such as your Google or Facebook account), we use the information you allowed us to collect from those third parties to facilitate account creation and login process. See the section below headed "HOW DO WE HANDLE YOUR SOCIAL LOGINS" for further information.
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- **To send you marketing and promotional communications** for Business Purposes and/or with your Consent. We and/or our third party marketing partners may use the personal information you send to us for our marketing purposes if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time (see the "WHAT ARE YOUR PRIVACY RIGHTS" below).
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- **To send administrative information to you** for Business Purposes, Legal Reasons and/or possibly for Contractual. We may use your personal information to send you product, service, and new feature information and/or information about changes to our terms, conditions, and policies.
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- **Fulfill and manage your orders** for Contractual reasons. We may use your information to fulfill and manage your orders, payments, returns, and exchanges made through the Sites or Apps.
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- **To post testimonials** with your Consent. We post testimonials on our Sites or Apps that may contain personal information. Prior to posting a testimonial, we will obtain your consent to use your name and testimonial. If you wish to update or

delete your testimonial, please contact us at support@ebitpayment and be sure to include your name, testimonial location, and contact information.

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- **Request Feedback** for our Business Purposes and/or with your Consent. We may use your information to request feedback and to contact you about your use of our Sites or Apps.
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- **To protect our Sites** for Business Purposes and/or for Legal Reasons. We may use your information as part of our efforts to keep our Sites or Apps safe and secure (for example, for fraud monitoring and prevention).
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- **To enforce our terms, conditions and policies** for Business Purposes, Legal Reasons and/or possibly Contractual.
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- **To respond to legal requests and prevent harm** for Legal Reasons. If we receive a subpoena or other legal request, we may need to inspect the data we hold to determine how to respond.
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- **For other Business Purposes.** We may use your information for other Business Purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Sites or Apps, products, services, marketing and your experience.

### **3. WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

We may share your data in order to provide certain services to you upon your request. For example, we will share your data with our lending partners so that they may credit score you and provide you with a loan or we may share your data with one of eBit System insurance partners so that they can provide insurance services to you. Your data will only be sent

across in these instances once you have requested to utilize these services. You can withdraw your consent at any time by contacting support via our in-App chat function, however, please be aware that this may impact your ability to use such services going forward. Please remember that when we share your data with our partners in such instances that you will also be subject to our partner's privacy policy as well.

From time-to-time, we may partner with certain third parties in order to offer you co-branded services or promotional offers. In order to provide these services to you and to allow us and any associated third party to optimize their/our offering to you, we will share some of your personal data with such third parties. We will obtain your express opt-in consent before we share your personal data with any company outside the eBit System group of companies for these purposes.

You can withdraw your consent at any time after giving your explicit opt-in consent by contacting support and letting us know.

***In Short:** We only share information with your consent, to comply with laws, to protect your rights, or to fulfill business obligations.*

We only share and disclose your information in the following situations:

- **Compliance with Laws.** We may disclose your information where we are legally required to do so in order to comply with applicable law, governmental requests, a judicial proceeding, court order, or legal process, such as in response to a court order or a subpoena (including in response to public authorities to meet national security or law enforcement requirements).
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- **Vital Interests and Legal Rights.** We may disclose your information where we believe it is necessary to investigate, prevent, or take action regarding potential violations of our policies, suspected fraud, situations involving potential threats to the safety of any person and illegal activities, or as evidence in litigation in which we are involved.
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- **Vendors, Consultants, and Other Third-Party Service Providers.** We may share your data with third party vendors, service providers, contractors or agents who perform services for us or on our behalf and require access to such information to do that work. Examples include: payment processing, data

analysis, email delivery, hosting services, customer service, and marketing efforts. We may allow selected third parties to use tracking technology on the Sites or Apps, which will enable them to collect data about how you interact with the Sites or Apps over time. This information may be used to, among other things, analyze and track data, determine the popularity of certain content and better understand online activity. Unless described in this Policy, we do not share, sell, rent or trade any of your information with third parties for their promotional purposes.

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- **Business Transfers.** We may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.
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- **Affiliates.** We may share your information with our affiliates, in which case we will require those affiliates to honor this privacy policy. Affiliates include our parent company and any subsidiaries, joint venture partners or other companies that we control or that are under common control with us.
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- **Business Partners.** We may share your information with our business partners to offer you certain products, services or promotions.
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- **With your Consent.** We may disclose your personal information for any other purpose with your consent.
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- **Offer Wall.** Our Apps may display a third-party hosted “offer wall.” Such an offer wall allows third-party advertisers to offer virtual currency, gifts, or other items to users in return for acceptance and completion of an advertisement offer. Such an offer wall may appear in our mobile application and be displayed to you based on

certain data, such as your geographic area or demographic information. When you click on an offer wall, you will leave our mobile application. A unique identifier, such as your user ID, will be shared with the offer wall provider in order to prevent fraud and properly credit your account.

#### **4. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?**

*In Short: We may use cookies and other tracking technologies to collect and store your information.*

We may use cookies and similar tracking technologies (like web beacons and pixels) to access or store information. Specific information about how we use such technologies and how you can refuse certain cookies is set out in our Cookie Policy.

#### **5. HOW DO WE HANDLE YOUR SOCIAL LOGINS?**

*In Short: If you choose to register or log in to our websites using a social media account, we may have access to certain information about you.*

Our Sites or Apps offer you the ability to register and login using your third-party social media account details (like your Facebook or Twitter logins). Where you choose to do this, we will receive certain profile information about you from your social media provider. The profile information we receive may vary depending on the social media provider concerned, but will often include your name, e-mail address, friends list, profile picture as well as other information you choose to make public.

We will use the information we receive only for the purposes that are described in this privacy policy or that are otherwise made clear to you on the Sites or Apps. Please note that we do not control, and are not responsible for, other uses of your personal information by your third party social media provider. We recommend that you review their privacy policy to understand how they collect, use and share your personal information, and how you can set your privacy preferences on their sites and apps.

#### **6. IS YOUR INFORMATION TRANSFERRED INTERNATIONALLY?**

The data that we accumulate from you will be transferred to and stored at, a destination inside the European Economic Area (EEA). As we provide an international service your data

may be processed outside of the EEA in order for us to fulfill our contract with you to provide the eBit System Services. We will need to process your personal data in order for us, for example, to action a request made by you to execute an international payment, process your payment details, provide global anti-money laundering and counterterrorist financing solutions and provide ongoing support services. We will take all steps to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our App and/or our Site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

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 App or our Site; any transmission is at your own risk. Once we have received your information, we will use rigorous procedures and security features to try to prevent unauthorized access.

Certain Services include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

***In Short:*** *We may transfer, store, and process your information in countries other than your own.*

Our servers are located in. If you are accessing our Sites or Apps from outside, please be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information (see "WILL YOUR INFORMATION BE SHARED WITH ANYONE?" above), in and other countries.

If you are a resident of the European Economic Area, then these countries may not have data protection or other laws as comprehensive as those in your country. We will, however, take all necessary measures to protect your personal information in accordance with this privacy policy and applicable law.

## **7. HOW LONG DO WE KEEP YOUR INFORMATION?**

***In Short:*** We keep your information for as long as necessary to fulfill the purposes outlined in this privacy policy unless otherwise required by law.

We will only keep your personal information for as long as it is necessary for the purposes set out in this privacy policy unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than the period of time in which users have an account with us.

When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize it, or, if this is not possible (for example, because your personal information has been stored in backup archives), then we will securely store your personal information and isolate it from any further processing until deletion is possible.

## **8. HOW DO WE KEEP YOUR INFORMATION SAFE?**

***In Short:*** We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate technical and organizational security measures designed to protect the security of any personal information we process. However, please also remember that we cannot guarantee that the internet itself is 100% secure. Although we will do our best to protect your personal information, transmission of personal information to and from our Sites or Apps is at your own risk. You should only access the services within a secure environment.

## **9. DO WE COLLECT INFORMATION FROM MINORS?**

***In Short:*** We do not knowingly collect data from or market to children under 18 years of age.

We do not knowingly solicit data from or market to children under 18 years of age. By using the Sites or Apps, you represent that you are at least 18 or that you are the parent or guardian of such a minor and consent to such minor dependent's use of the Sites or Apps. If we learn that personal information from users less than 18 years of age has been collected, we will deactivate the account and take reasonable measures to

promptly delete such data from our records. If you become aware of any data we have collected from children under age 18, please contact us at [help@ebit-payment-ico.com](mailto:help@ebit-payment-ico.com).

## **10. WHAT ARE YOUR PRIVACY RIGHTS?**

You have rights under data protection laws in relation to your personal data. Please see below to find out more about these rights:

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you. If you require this, then please reach out to our support team.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you require this, then please reach out to our support team.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data 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 data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. As an FCA authorized firm, eBit System is under certain obligations to retain certain data for a minimum of 6 years (see above). Please note that these retention requirements supersede any right to erasure requests under applicable data protection laws.
- Object to the processing of your personal data. This is in situations 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 as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights. As an FCA authorized firm, eBit System is under certain obligations to process and retain certain data for compliance purposes. Please note that these requirements supersede any right to objection requests under applicable data protection laws. If



you object to the processing of certain data then we may not be able to provide the eBit System Services and it is likely we will have to terminate your account.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Please note that any requests in relation to the restriction of the processing of your data mean that we may not be able to perform the contract we have or are trying to enter into with you (including the eBit System Services). In this case, we may have to cancel your use of the eBit System Services but we will notify you if this is the case at the time.
- Request the transfer of your personal data to you or to a third party. We will provide to you, your personal data in a structured, commonly used, machine-readable format, which you can then transfer to an applicable third party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. If you require this then please reach out to our support team via the in-App chat function.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the eBit System Services to you. We will advise you if this is the case at the time you withdraw your consent.

#### IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (including the eBit System Services). In this case, we may have to cancel your use of the eBit System Services but we will notify you if this is the case at the time.

#### TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

***In Short:*** *In some regions, such as the European Economic Area, you have rights that allow you greater access to and control over your personal information. You may review, change, or terminate your account at any time.*

In some regions (like the European Economic Area), you have certain rights under applicable data protection laws. These may include the right (i) to request access and obtain a copy of your personal information, (ii) to request rectification or erasure; (iii) to restrict the processing of your personal information; and (iv) if applicable, to data portability. In certain circumstances, you may also have the right to object to the processing of your personal information. To make such a request, please use the contact details provided below. We will consider and act upon any request in accordance with applicable data protection laws.

If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time. Please note however that this will not affect the lawfulness of the processing before its withdrawal.

If you are resident in the European Economic Area and you believe we are unlawfully processing your personal information, you also have the right to complain to your local data protection supervisory authority. You can find their contact details here: [http://ec.europa.eu/justice/data-protection/bodies/authorities/index\\_en.htm](http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm)

### **Account Information**

If you would at any time like to review or change the information in your account or terminate your account, you can:

- Log into your account settings and update your user account.

Upon your request to terminate your account, we will deactivate or delete your account and information from our active databases. However, some information may be retained in our files to prevent fraud, troubleshoot problems, assist with any investigations, enforce our Terms of Use and/or comply with legal requirements.

**Cookies and similar technologies:** Most Web browsers are set to accept cookies by default. If you prefer, you can usually choose to set your browser to remove cookies and to reject cookies. If you choose to remove cookies or reject cookies, this could affect certain features or services of our Sites or Apps. To opt-out of interest-based advertising by advertisers on our Sites or Apps visit <http://www.aboutads.info/choices/> .

**Opting out of email marketing:** You can unsubscribe from our marketing email list at any time by clicking on the unsubscribe link in the emails that we send or by contacting us using the details provided below. You will then be removed from the marketing email list – however, we will still need to send you service-related emails that are necessary for the administration and use of your account. To otherwise opt-out, you may:

- Note your preferences when you register an account with the site.
- Access your account settings and update preferences.

## **11. DO CALIFORNIA RESIDENTS HAVE SPECIFIC PRIVACY RIGHTS?**

***In Short:** Yes, if you are a resident of California, you are granted specific rights regarding access to your personal information.*

California Civil Code Section 1798.83, also known as the “Shine The Light” law, permits our users who are California residents to request and obtain from us, once a year and free of charge, information about categories of personal information (if any) we disclosed to third parties for direct marketing purposes and the names and addresses of all third parties with which we shared personal information in the immediately preceding calendar year. If you are a California resident and would like to make such a request, please submit your request in writing to us using the contact information provided below.

If you are under 18 years of age, reside in California, and have a registered account with the Sites or Apps, you have the right to request removal of unwanted data that you publicly post on the Sites or Apps. To request removal of such data, please contact us using the contact information provided below, and include the email address associated with your account and a statement that you reside in California. We will make sure the data is not publicly displayed on the Sites or Apps, but please be aware that the data may not be completely or comprehensively removed from our systems.

## **11. MARKETING**

1. We want to make it crystal clear how we use your data for marketing purposes and how you can 'opt-out' from receiving any marketing communications from us whenever you want.
2. We strive to provide you with choices regarding certain personal data uses, particularly in marketing and advertising.

PROMOTIONAL OFFERS FROM US

1. We may use your personal data (such as your Submitted Information, Location Information or transaction information) to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services, and offers may be relevant for you.
2. You will receive marketing communications from us if you have signed up to and/or utilize the eBit System Services and, in each case, you have not opted out of receiving marketing notifications.

#### THIRD-PARTY MARKETING

1. We will obtain your express opt-in consent before we share your personal data with any company outside the eBit System group of companies for marketing or promotional purposes.

#### OPTING OUT

1. You can ask us or third parties to stop sending you marketing messages at any time by adjusting your marketing preferences via 'Support.

### **DISCLOSURE OF YOUR INFORMATION**

#### DATA PROCESSING PARTNERS

1. We will disclose the data we collect from you to certain third parties who use personal data in delivering their services to us, they use data securely and confidentially and under strict contractual controls in accordance with data protection laws and enforced by eBit System.
2. We send personal data to the following sets of data processors in order to perform the eBit System Services:
  - Fraud prevention agencies
  - This is in order to verify your identity, protect against fraud, comply with anti-money laundering laws and to confirm your eligibility to use our products and services;
  - Cloud storage providers
  - This is in order to safely and securely store your data with eBit System;
  - Banking and financial services partners
  - Financial services providers that help us provide the eBit System Services including banking partners, banking intermediaries, and international payments services providers;
  - Credit reference agencies

- For the purpose of assessing your credit score.
- Card manufacturing/ personalization and delivery companies
- For the purpose of creating your personalized eBit System card and delivering this to you at your requested address;
- Advertisers and analytics providers
- If we decide to employ advertisers to promote our products and services, the advertisers and their advertising networks may require anonymized personal data to serve relevant adverts to you and others. We will never disclose identifiable information about individuals to advertisers, but we may provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help our advertising partners provide a tailored and targeted campaign, relevant for a subsection of our users (for example, women in Paris).
- In some instances we may use personal data we have collected from you to enable our advertising partners to display their advertisement to their target audience;
- We also use analytics and search engine providers that assist us in the improvement and optimization of our site;
- Companies within the eBit System group
- In order to provide a unified service across all of our products and services, we may disclose your personal information to any member of the eBit System group, which means any of our subsidiaries or related entities. Companies in the eBit System group will be acting as joint controllers or processors in order to provide the eBit System Services.

We may also disclose your personal information in the following circumstances:

- If eBit System or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligation or request.
- In order to:
  - enforce or apply the General Terms of Service and/or the Business Terms and/or any other agreements between you and us or to investigate potential breaches; or

- protect the rights, property or safety of eBit System, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

### **13. DO WE MAKE UPDATES TO THIS POLICY?**

*In Short:* Yes, we will update this policy as necessary to stay compliant with relevant laws.

We may update this privacy policy from time to time. The updated version will be indicated by an updated “Revised” date and the updated version will be effective as soon as it is accessible. If we make material changes to this privacy policy, we may notify you either by prominently posting a notice of such changes or by directly sending you a notification. We encourage you to review this privacy policy frequently to be informed of how we are protecting your information.

### **14. HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

We have appointed a data protection officer ("DPO"). Our DPO has a number of important responsibilities including:

- monitoring eBit System compliance with the GDPR/RODO and other data protection laws;
- raising awareness of data protection issues, training eBit System staff and conducting internal audits;
- cooperating with supervisory authorities such as the ICO on our behalf.

If you have questions or comments about this policy, you may contact our Data Protection Officer (DPO), \_\_\_\_\_, by email at \_\_\_\_\_, or by post to:

eBit System Limited  
Old Bakery Street 192  
VLT1455, Malta

If you have any further questions or comments about us or our policies, email us at [help@ebit-payment-ico.com](mailto:help@ebit-payment-ico.com) or by post to:

eBit System Limited  
Old Bakery Street 192  
VLT1455, Malta

