

Privacy Statement

APPLICABLE AS OF 25TH OF MAY 2018

Introduction

At MyCardWallet, we do everything in our power to protect your data and give you full control over your personal data on our platforms. Our aim is that you always feel informed and empowered with respect to safeguarding your own privacy, and the privacy of your customers. As a Cloud Communication Platform as a Service (CPaaS), we process personal data in order to deliver our services. This privacy statement contains information about what data we collect, why we collect it, and how we handle that data.

About MyCardWallet

MyCardWallet is a Cloud Communication Platform as a Service (CPaaS) that's disrupting the marketing, loyalty, communications and finance industry with innovative solutions that build fan bases and reduce transaction cost. Our customers are generally companies that integrate our services in their business operations.

We only ask for personal data when we need it for business purposes or to provide you and your customers with relevant information. Whether you sign up for our newsletter, sign a Service Agreement, order a digital card, you leave your personal data with us for a particular purpose. You always have the opportunity to explicitly agree to the collection, use, disclosure, and sharing of the information you've provided.

When customers (businesses and consumers) share end user information with us, we always handle the data in accordance with data protection regulations, including GDPR. We don't use that data for any purposes, other than specifically issued by the customer who provides the data.

Throughout this document you'll encounter the mention of several roles and responsibilities. Here's a quick explanation of different roles, responsibilities, and systems of governance that are an integral part in ensuring your data is protected.

Customer is the company or consumer that ask us to create/update and send digital cards to mobile devices. Of their customers or the individual.

Controller is the department that an individual (or data subject) provides their personal data to. The Controller determines the purpose for the personal data (e.g.

to receive important information or for sending invoices) and is responsible for the correct handling of the data subject's data.

Processor is the department that provides part of the service, and needs specific personal data. To give an example: when one of our customers sends (updates on) digital cards and/or information through our platform, we need personal data such as a phone number to fulfil the service. The Processor only processes personal data according to the instructions of the Customers Controller.

Helpdesk is the department that interacts with customers and customers (end user) of our customers (businesses). To give an example: when an end user has a question or complaint on our services their will be interaction trough mail and or phone in order to perform their tasks.

Depending on your relationship with MyCardWallet, we can be Controller, Processor and Helpdesk. If you have any questions about these terms or more general inquiries about how we handle identifiable data, you can always contact us at info@mycardwallet.nl or send a written inquiry to:

MyCardWallet B.V.
De Grote Wielen 31
1187LJ Amstelveen
The Netherlands

Why we collect personal data

All the personal data we process is lawfully obtained and with a legal basis. The purpose of the information we collect is so we can continue to conduct and expand our day-to-day business, and enable you to use our services. Personal data can also help us to improve our products to fit the needs of our customers.

Just as keeping your data safe is our priority, so is protecting your rights and freedom as an individual, all in full compliance with global standards of rules and regulations for the protection of data. We process personal data based on a limited set of legal bases: 1) explicit consent (e.g. ticking a box on our website when you want to enter personal data), 2) signing a contract to receive a MyCardWallet service, and 3) we have a legal obligation to do so (such as storing financial billing data for the time-period required).

We collect personal data for specific purposes, and we'll always tell you what those are when we collect it. We'll use the collected data for that purpose alone, as long as our relationship stays the same. If our relationship changes, we may need more information. For example, if you fill out a form to request more information, we'll use your data to send it to you. If you then decide to become a customer, we need additional information including your billing address.

Here's a list of the purposes we need information for.

- Sharing relevant information about our products and services,
- Creating an account that's connected to your person and company,
- Analysing usage of our products and services,
- Detecting fraudulent or unlawful activity,
- Keeping your account secure.
- Deliver digital cards, information and updates through out service.

In order to develop our business, we make use of third parties that supply us with information collected from publicly available sources and data enrichment providers. The information we collect is based on personas created by automated processes. In order to make sure we only approach the right audience, we only retain information that will help us reach out to people and companies that would benefit from the use of our services and products. If you no longer want to be contacted by our sales team, you can always object.

The personal data we collect may include depending on our relationship:

- Name,
- Contact details,
- Account credentials,
- Financial data,
- Usage data,
- Location data,
- Content data.

How we collect and use data

To be thorough, we've listed how we collect personal data and how it will be used. The information below is not exhaustive and might be updated in accordance to new legislation, or because further clarification is needed based on a new product or service.

When browsing our websites we **don't** use automatically data collection through cookies and trusted tracking technologies on your browser.

When filling out a web forms on our websites, you directly interact with us.

Whenever you sign up for our services, we ask for some personal data like your email address, company, name, mobile and more depending on the contact and usage of our digital cards. The particular fields to fill in may differ per form, we'll never ask you for irrelevant information, and we'll always use the data for the purpose you submitted it for.

If you're already a customer and you reach out for assistance through our websites, we'll use the data collected from your account. That gives us relevant insight into how you're using our platforms, what your business needs are, past support issues, and so on. Pulling this information allows us to tailor our assistance and provide the best possible support.

When using free products such as a demo card, Plasticfree cards, you need to fill out some personal data. The information we ask for is limited to what we need to provide you with the trial account.

When using digital cards that we deliver and maintain for our customers we use data from these customers in order to create a digital card. To send these cards to end-users we collect data through our sites only when our customers do not provide the data. This is data we needed to send digital cards to the end-users.

We always ask you to authenticate yourself when ordering payment cards, ID cards etc.

Sometimes, we're legally required to collect additional information depending on the service. For instance, if you want to operate in Canada, Denmark, Malaysia, or the United States, you need specific approval. You request this on your account portal. To do so, we require details like the purpose of your campaign, and a template or example card that you would send via MyCardWallet. We then share this information with local authorities of the country you specified to complete the procedure.

Sharing information

Whether we fulfil the role of Controller, Processor or Helpdesk, we always make sure that the parties we work with adhere to the GDPR Privacy and Security Standards. Additionally, we will make sure that another party will not use the data you have entrusted to us for any other purpose than delivering the service you signed up for.

Here's why and with who we share information:

Telecom operators and other communications service providers for proper routing and connectivity. We reach people's smartphones through telecom operators and other communication service providers. In order to make sure the message you send will reach the intended recipient, independent of their location, we make use of a global network of telecom providers.

Third party service and technology providers who perform necessary actions on our behalf. We can share personal data with third-party service providers, like our payment processor and hosting providers. We never share information without due contracts or for specific purposes that can be fulfilled in-house.

MyCardWallet Family. In order to do business global we might need to share personal data between our legal entities. Both MyCardWallet B.V. and all other entities in the MyCardWallet Family will only ever use the data as described in this statement.

Targeted Advertising. We don't sell or rent any information to third parties for advertising or marketing purposes.

Government Requests

We won't share your information with third parties without your permission, except when we're required to by law.

We will only respond to government requests when we are legally obliged to do so. The request needs to 1) be sent from a government agency, 2) be issued where we are subject to the respective jurisdiction, 3) be an enforceable subpoena, search warrant, court order or similar official instrument compelling us to disclose the information requested, and 4) state the categories of records sought and specific time period.

International transfer of data (outside EEA area)

As a cloud based enterprise, our usage of the internet almost always involves the international transmission of personal data, both within and outside the EEA. If in our capacity as Processor digital card and the personal data involved transfer to a country outside the EEA, this is always determined by the use of our client in their role as Controller.

We take care to ensure our partners outside the EEA have sufficient guarantees and safeguards in place to properly treat and protect your data. We always make sure we contractually agree on data protection to protect the rights and freedoms of all individuals, inside and outside the EU, and ensure compliance with the GDPR.

Data security and compliance obligations

We do everything in our power to keep your data safe. We invest in state-of-the-art technology and thorough security screenings of our infrastructure and employees to minimise security risks.

All our accounts are password, and possibly two-factor authentication, protected. If your (login) information is stolen or used without your permission, it's imperative you notify us immediately so we can secure your account and/or data. You can do so by sending an email to helpdesk@mycardwallet.nl with the subject '**Urgent: account credentials**'.

If you want to know more about the measures we take to keep your data secure, ask for our Security Statement by sending an email to helpdesk@mycardwallet.nl with the subject **Security Statement**.

Retention of personal data

How long we keep personal data depends on its nature and the purpose for which it was obtained. Personal data related to our services, such as telephone numbers, have a default retention period of 6 months.

If you would like to review, amend, transfer or request to delete personal data during the default retention period, you can use our helpdesk to give/change/delete you this information.

If we've come to an agreement with you that we can store your data for an alternative period of time, we'll do that for as long as the agreement stipulates. After the agreed retention period, we might keep data in a non-identifiable form for archival, statistical and/or other legitimate purposes. None of it will be able to identify you as an individual.

Controlling your rights and choices

Even though we collect your data to conduct business, your data stays your own. You stay in control of your personal data and can at any time choose what you want us do with it.

You can at any time:

Withdraw consent to our processing of your data. If for whatever reason you no longer want us to use your personal data, you're free to change your mind. We will always comply with your request, unless we're legally required to keep your data. Which basically means that if there is any legal dispute, about for example outstanding invoices, we can keep your information until it's resolved.

Control and review your data. You can always see the information we have on your digital card. Please contact our helpdesk to change/delete your data. We'll process your request as soon as possible with a maximum of one a month of receiving it. If a request is complicated or we get too many requests to process at a given time period, our response time can be increased by two months. You'll be informed when such an extension period applies. When you choose to delete your personal data, we hold the right to hold onto anonymised and aggregated data. If we do so, nothing will be able to identify you as a person in any way. If we're required to retain your information for legal reasons, we will let you know in response to your request.

Object to and restrict the processing of data

When your personal data is being processed to fulfil a legitimate interest to us, such as marketing, you're able to object and unsubscribe. You can always exercise your right to restrict processing, and we'll make sure to process your data in the way you specify. We will assess each request on a case-by-case basis according to the rules set out by the GDPR. If we override your request, we need to demonstrate that we have compelling grounds to do so, or that there's a legal claim that allows us to retain personal data. If you don't agree with how we've handled your request, you can file a complaint with the Supervisory Authority of The Netherlands, the authority related to the Member State you live or work in, or the country in which the suspected infringement has taken place.

Children

We never knowingly collect and/or process any personal data from children under the age of 18. If we discover we've received personal data from a child without parental or legal consent, we will immediately take reasonable steps to delete that information as quickly as possible. If you believe we have any information from or about a child, please contact us at helpdesk@mycardwallet.nl with the subject: 'Children'.

Links, third party websites and social networking sites

Our online services and communications may embed hyperlinks to websites that are not owned or controlled by MyCardWallet. We're not responsible for the privacy practices, policies, notices or content that are not on our website or domain, even if we've embedded a link to them. We encourage you to read and understand the privacy practices, policies, notices, and content of any linked sites that you visit.

Changes in our Privacy Statement

This statement might be subject to changes. We reserve the right to change, update, modify, or remove any part of this Privacy Statement at any time. If any modification substantially affects your rights under this statement, we will send you an email where possible. You can always decide to continue to use our services or not in accordance with the new terms.

Disputes

If you have any dispute with us relating to our privacy practices, please contact our legal team at helpdesk@mycardwallet.nl with the subject: 'Dispute'. If we can't reach an understanding via email, please refer to the Terms, which describes how disputes will be resolved between us. Please be sure to review the Terms before you use any of our products and services.

Contact us

If you have any questions left regarding the processing of your personal data when you use our website and services, or have any feedback or suggestions to make this policy better, please don't not hesitate to contact us.

If you're not satisfied with our reply, you may refer your complaint to the relevant regulator in your jurisdiction.

You can reach our Data Protection Officer at at helpdesk@mycardwallet.nl or at our HQ address:

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1187LJ Amstelveen
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