

PRIVACY POLICY

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About this Privacy Policy

FINTECH VALLEY LTD (Trading name: "Cepheus"), registered in England and Wales under company number 11456625, FCA ref. No. 900986 and all its business segments, divisions and subsidiaries (collectively "**Cepheus**", "**we**" or "**our**") are committed to conducting business in a way that complies with applicable data protection laws and regulations in every country in which Cepheus operates.

This Privacy Policy sets out how we collect, store, use and safeguard your personal data. It applies to the personal data we collect through our online interaction, such as when you visit our Website or Mobile Application (collectively, our "**Sites**"), as well as our offline interaction, such as when you attend one of our events (e.g., marketing event, trade show or sales meeting).

Generally, the Cepheus entity that operates the Sites you visit or the entity that you interact with offline is the entity that acts as controller of any personal data collected through your interaction and is the entity that is primarily responsible for how that personal data is used.

For your information and convenience, our Website may contain links to other websites or apps run by other organisations, which we do not control. This Privacy Policy does not apply to those other websites and apps, so we encourage you to read their privacy policies to stay informed of how they use your personal data.

Please click on the headings below to explore topics that are of interest to you.

Which personal data we collect

The personal data we collect depends on the ways in which you interact with Cepheus, and it may include the following:

- Your name, address and contact details, including email address, telephone number, and other similar contact information.
- Passwords, password hints, answers to security questions, and similar credentials used for authentication and account access.
- Your age, gender, country, income, preferred language, level of education, occupation, and similar demographic information.
- Data necessary to process your payment if you make purchases, such as your credit card number and the security code associated with your credit card.
- Your location, including the location derived from your IP address.
- Your interests and preferences including the languages or cities you prefer, your preferred products and services, and other similar data that helps us build up a picture of your interests and preferences.
- Data about your device (including device identifiers) and how you and your device interact with our Sites.



- Other information you provide to us and the content of messages you send to us when you submit feedback, or when you make personal data inquiries, request products or services, contact us for customer support or account information changes, or complete surveys.

We do not knowingly collect personal data from anyone under the legal age.

How we collect your personal data

Cepheus collects your personal data from you, from third parties and through cookies.

- **Data obtained from you:** You provide personal data directly to us when you purchase our products or register for our services, create an account on our Sites, interact with us on social media, click an advertising link that we put on someone else's website, submit a query to us via our Sites, contact us for support, provide a testimonial, comment on blogs or articles featured on our Sites, register for our events (including webcast events), enter our competitions, sign up for our special offers, participate in our research panels or fill in our surveys.
- **Data obtained from third parties:** We obtain personal data about you from third parties, including data brokers from whom we purchase market intelligence, business partners and service providers that help us determine a location based on your IP address in order to customize certain messaging to your location and publicly-available sources such as open government databases or other data in the public domain (e.g., on third party social media platforms, like Instagram, Facebook, Twitter, or LinkedIn).
- **Data obtained through cookies:** We also collect personal data about you by using cookies to record how you interact with our Sites. You can learn more about cookies and how we use them in our Cookie Policy.

Why we collect your personal data and our lawful bases for processing it?

Cepheus processes your personal data for different purposes, during and after the end of your relationship with us. These purposes include:

- Providing you the Sites and offline interactions.
- Enabling or administering our business, including administering customer accounts, responding to supplier inquiries and monitoring quality assurance.
- Understanding and improving our business or customer relationship generally with a view to improving our products and services and developing new ones.
- Communicating with you and serving you tailored advertising both on and off our Sites (in circumstances where your consent is not required). For information on how we use your personal data to advertise to you, please see the 'Marketing and advertising' section.
- Protecting you, us or others from threats, such as security threats or fraud.



- Managing corporate transactions (e.g., mergers and acquisitions, strategic partnerships).

We will only use your personal data where we have lawful bases for doing so. Lawful bases include, among others, each one of the following:

- Consent (where you have given consent).
- Contract (where using your personal data is necessary for the performance of a contract with you).
- Legal obligation (where using your personal data is necessary for compliance with laws that apply to us).
- Vital interests (where using your personal data is necessary to provide urgent safety notices or product recalls).
- Legitimate interests (where we have legitimate interests and they do not outweigh your privacy rights).

Where we rely on your consent to use your personal data, you have the right to withdraw or decline your consent at any time.

If you have any questions about, or objections to, the lawful bases upon which we use your personal data, please contact our data privacy officers in any of the ways described at the end of this Privacy Policy.

Marketing and advertising

We use your personal data to send you marketing information directly from us by post, email or SMS, where you gave your consent to such use (unless there is another lawful bases for using your personal data for marketing and advertising purposes in your jurisdiction, which does not require your consent).

We also use your personal data and information inferred from your personal data to tailor ads to your interests and preferences. This allows us to improve the relevance of our ads to you.

We may share your personal data with our third-party advertising partners in order to serve you targeted ads on our Sites or on third party websites and online services. Digital media agencies provide strategic and technical input to our advertising campaigns. To help us engage with specific target markets, they advise us how and where to advertise through online and print advertising and other forms of media management. We may also share your personal data with other categories of recipients; however, these do not process personal data under UK data protection laws (e.g., in cases where (i) personal data is controlled by a Cepheus entity established outside the UK and (ii) Cepheus does not offer any goods or services to, or monitor the behavior of, data subjects in the United Kingdom). Our advertising partners may then use cookies to measure the effectiveness of the ads. For more information on how to reject targeted advertising or interest-based advertising cookies please read our Cookie Policy.

You have the right to object to our use of your personal data for marketing and advertising purposes, or – where we rely on your consent to use your personal data for marketing and advertising purposes – to withdraw your consent.



How we store, process, transfer and protect your personal data.

The personal data we collect about you will be stored in a range of different places, including on our servers and in our information management systems and databases (e.g., Cepheus's marketing databases and customer support systems).

Because we are a global business, we may process your personal data in different geographical locations (including outside the United Kingdom).

We only share your personal data on a need-to-know basis as follows:

- Internally, with various Cepheus departments, including, for example communications, marketing, sales, finance, legal, procurement and information technology ("IT").
- Externally, with third parties that help us run our business, including, for example, third parties that manage our IT systems, serve advertisements, collect customer accounts and verify customer credit.

To ensure that your personal data is adequately protected no matter where it is processed, we have internal policies and controls in place to prevent your personal data from being lost, accidentally destroyed, misused, unintentionally disclosed, or accessed other than by our employees or third parties hired by Cepheus.

For example, we request that Cepheus employees familiarise themselves with our IT policies governing data security.

When we engage third parties to process personal data on our behalf, we require that they do so on the basis of Cepheus's written instructions, under a duty of confidentiality, and in accordance with technical and organisational measures that are appropriate to ensure the security of your personal data.

Your rights regarding your personal data

You have a number of rights regarding your personal data.

- **Accessing your personal data.** You can request a copy of the personal data we hold about you.
- **Correcting and updating your personal data.** You can ask us to correct or update your personal data at any time if you discover that any of it is inaccurate or out of date.
- **Erasing your personal data.** You can require Cepheus to erase personal data in certain circumstances and we will take reasonable steps to inform other controllers that are processing the data that you have requested the erasure of any links to, copies or replication of the data. Your personal data will be removed from Cepheus systems within a reasonable time and will be deleted. However, Cepheus may retain a copy of your personal data (i) if and as long as required by law, regulation, administrative or court order or for internal auditing purposes, or (ii) as electronic data stored due to automatic archiving and back-up procedures. Please note that in the event of a legal dispute between you and Cepheus, your personal data may be retained until final settlement of the legal dispute.



- **Objecting to or restricting the processing of your personal data.** You can ask us to stop using all or some of your personal data (e.g., if we have no lawful basis to keep using it) or restrict how we process it.
- **Withdrawing your consent.** Where we rely on your consent as the legal basis for processing your personal data, you can withdraw your consent at any time and you can prevent further processing if there is no other legal basis upon which Cepheus can process your personal data.
- **Porting your personal data.** You can ask us to transfer the personal data that we hold about you to a third party electronically.

If you would like to exercise any of these rights, please advise Cepheus by sending us an email at: privacy@cepheus-pay.co.uk. You can also raise a complaint about our data processing practices with the data protection regulator in your jurisdiction. Please see the 'How you can contact us about this Privacy Policy or make a complaint' section below.

How long we keep your personal data

The period for which your personal data is held is determined by a number of factors including the purpose for which we use that personal data and our legal obligations. We do not generally retain personal data in an identifiable form for longer than is necessary, though in some cases we may choose to retain certain personal data in a depersonalized or aggregated form.

How we make changes to this Privacy Policy

Should we elect to change this Privacy Policy, we will post the changes here, so please check this page from time to time to ensure that you are satisfied with any changes.

How you can contact us about this Privacy Policy or make a complaint

If you have any questions or suggestions about this Privacy Policy or about how we use your personal data, please contact us at:

Email: privacy@cepheus-pay.co.uk

Please let us know if you are unhappy with how we use your personal data. The response to your complaint may take up to 30 days.