

Personal data protection policy

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CASHlib, a brand represented by the regulated entity Prepaid Optimal Solutions whose registered office is located at 35 Avenue Monterey, L-2163 Luxembourg (n°B216209), attaches great importance to the principles of honesty and transparency. We are committed to building solid, long-term relationships with our customers, based on trust and mutual interest. Part of this commitment involves protecting and respecting your privacy and your choices. Respecting your privacy is an essential issue for us. This is why you will find below our commitments in terms of personal data protection.

The purpose of this policy is to inform you about how we collect and process your personal data ("Personal Data"), why we use it, how long we keep it, with whom we may share it and what rights you have. Please refer to Appendix 1 for a full definition of Personal Data.

If you are one of our "Vouchers" prepaid voucher distributors or one of our Voucher merchant partners, our contracts with you contain more detailed information on how we use your Personal Data.

If you are a customer (user of our Vouchers), we recommend that you carefully read our privacy policy, as well as those of the distributors and partner merchants with whom you have a relationship, to understand how they handle your data. Customers can purchase Vouchers on our CASHlib website, from online distributors and physical merchants approved by CASHlib: "the Distributors". They can then use these Vouchers with online merchants "Partner Merchants" approved by CASHlib.

The CASHlib website may contain links to third-party websites. If you follow a link to any third-party site, please note that the site's own policy on the protection of Personal Data will apply and that we cannot in any way be held responsible for these policies or for the processing of your data by these third parties. We invite you to familiarize yourself with these policies before submitting Personal Data to them.

The purpose of this policy is to explain our Personal Data practices.

It covers the following aspects:

1. The Personal Data we may collect
2. How we use your Personal Data
3. The transmission, storage and security of your Personal Data
4. Information on how to exercise your rights
5. How to contact us
6. Our Cookie Policy
7. Changes to our Privacy Policy

1. The Personal Data we may collect

We collect and store the following Personal Data (including your financial data) that you provide to us:

- Use of our Services: The Personal Data you provide us when you fill in a registration or contact form on our website, including, but not limited to, your last name, first name, e-mail address, date of birth and telephone number. You may also provide us with your contact details, identification, photograph, address, financial details or bank details to enable us to perform a contract you have entered into with us for the purchase and any operations relating to the use of Vouchers;
- Correspondence and other communications: If you contact us via our Customer Support or any other contact form on the CASHlib website, we will retain this correspondence or communication;
- Responses to satisfaction surveys or information about new products and services: We may invite you to respond to satisfaction surveys for research purposes in order to develop and improve our service offering. It is also customary to inform our customers of changes to the functionality of the CASHlib website or of new products and services offered by CASHlib. In such cases, we collect the information you provide in response to surveys and feedback on CASHlib developments;
- Use of the CASHlib website: Information may be collected about your browsing activities through cookies and other tracking technologies, including, but not limited to, your IP address, browser version and operating system, browser language, connection times, traffic data,

location data, browsing logs, site movements and other communication data. We may also collect information about the pages you visit on the CASHlib website and the actions you take during your visit to our site.

- Information from third parties: We obtain information from third parties, affiliated companies or business partners, starting with our Merchant partners in the context of fulfilling our contract (issuing and processing Vouchers) and, potentially, from commercial information agencies or government departments.

2. Use of your personal data

This section explains the purposes for which we use the Personal Data we collect and store and, in accordance with our obligations, in particular under European law governing the use of Personal Data, what the legal basis is for our processing of Personal Data. For further information on the meaning of the grounds, otherwise known as the legal grounds for the processing carried out, please refer to Appendix 2 entitled "Grounds for use" of this policy.

We never use your Personal Data without a valid legal basis. As the case may be, we rely on your consent or on the fact that the processing is necessary for the performance of a contract concluded with you, to safeguard your interests, or to comply with our legal obligations. We may also seek the legal basis of legitimate interest, taking into account your own interests and rights.

To be able to offer you our services or communicate effectively with you, and in particular to respond to your requests:

We use your Personal Data to respond to your request for contact, proposals or commercial offers that you may have requested, to honor our contractual commitments or to meet regulatory obligations.

When we use your data for these purposes, we often rely on your prior informed consent, or on contractual necessity (i.e., we would not be able to fulfill our part of the contract without using your data for this purpose), or on the legitimacy of our interests (i.e., we have legitimate interests that we intend to preserve, and your personal data is essential to do so).

To give you access to protected parts of the CASHlib website:

To provide you with an online account after you have filled in a form to create an account on the CASHlib Website.

When we use your data for these purposes, we do so on the basis of contractual necessity (i.e., we would not be able to allow you to acquire and use your Vouchers on the CASHlib Website without using your data for this purpose), or on the basis of our legitimate interests (i.e., we have legitimate interests that we intend to preserve, and your personal data is essential to do so).

To provide you with commercial content:

We may also use your Personal Data for direct marketing purposes. Where required by law, we will ask for your prior consent. We will give you the opportunity to unsubscribe or opt-out of further electronic marketing communications sent to you. You may also opt-out of such communications by contacting us by e-mail at [.dpo@cashlib.com](mailto:dpo@cashlib.com)

When we use your data for these purposes, we rely on obtaining your prior consent, or on the legitimacy of our interests (i.e. we have legitimate interests in keeping you informed about our products and services, and we need to use your personal data to do so).

For research and development purposes:

To analyze your Personal Data in order to better understand you with a view to continuing to develop and improve our products and services.

When we use your data for these purposes, we rely on the legitimacy of our interests (i.e. we have a legitimate interest in improving our products and services and must use your Personal Data to do so).

To ensure the proper functioning of our CASHlib website and the relevance of its content:

We collect data and statistics about the use and effectiveness of our CASHlib Website through various technological means to personalize your browsing experience on our site and facilitate our interactions with you. You will find more information below in our Cookie policy . We also collect information so that the content of the CASHlib website is presented to you in the most transparent, efficient and user-friendly way possible. As part of this process, we may transmit your Personal Data to our Distributors, suppliers and/or service providers who are CASHlib's subcontractors.

Depending on the type of cookies we install (from essential cookies to marketing cookies), we base our use on the legitimacy of our interests in ensuring the proper functioning of our site or on obtaining your prior

consent. When we use your data for content relevance, we generally base our use on the legitimacy of our interests (i.e. we have a legitimate interest in ensuring that our content is adjusted to a more informed and user-friendly use of our services, which cannot be done without using your Personal Data).

To notify you of changes:

To notify you of changes to our services and products or to the way we process your Personal Data.

When we use your information for these purposes, we base our use on the legitimacy of our interests (i.e. we cannot notify you of these changes without using your Personal Data).

To restructure or change our business:

In the event of a total or partial sale of our business or restructuring, we may be required to disclose your Personal Data to third parties (or their advisors) as part of "due diligence" procedures to enable analysis of any proposed sale or restructuring. We may also transfer your Personal Data to the entity resulting from the restructuring or to a third party following the sale or restructuring for use for the same purposes as described in this Privacy Policy.

When we use your information for these purposes, we base our use on the legitimacy of our interests (i.e. we must use your Personal Data in order to do so).

Contractual, legal or regulatory obligations:

We may disclose your Personal Data to third parties (service providers, parties to contracts, agents, advisors, group companies, affiliates, subsidiaries, supervisory authorities) in order to fulfill our contractual duties or legal obligations, or to protect your interests.

We collect data about you as part of our Know Your Customer (KYC) obligations and for tracking queries and transactions to ensure the quality of our services and compliance with our legal obligations to combat fraud, money laundering and the financing of terrorism.

When we use your information for these purposes, we base our use on our legal obligation (i.e. legislation requires us to monitor certain behavior and activities) or on our legitimate interests (i.e. we have legitimate interests in monitoring transactions to detect fraudulent activity and we need to use your Personal Data).

In addition, we may need to use your Personal Data to comply with regulatory requirements, in particular in connection with the fight against money laundering and terrorist financing, or to interact with regulators where appropriate, which may involve disclosing your data to third parties, judicial services, and regulators or law enforcement agencies, as part of inquiries, proceedings or investigations carried out by these parties when we are obliged to do so.

When we use your data for these purposes, we do so on the basis of contractual necessity (i.e., we would not be able to fulfill our part of an agreement without using your data for this purpose), our legal obligations (i.e., we are legally obliged to comply with certain laws) or the legitimacy of our interests (i.e., our legitimate interests compel us to cooperate with law enforcement and regulatory authorities under applicable law and we must use your Personal Data to do so).

3. Transmission, storage and security of your Personal Data

Recipients

In order to respond to your requests or meet our regulatory obligations, we may need to share or transfer your Personal Data within our group of companies, potentially in a different geographical area or jurisdiction from yours. Where appropriate, we may also transfer your Personal Data to third parties such as our Merchant partners, or other subcontractors such as service providers in order to better meet your requests and our legal requirements.

We contractually require these recipients to use or disclose your Personal Data (i) only to the extent necessary to perform these functions on our behalf (ii) and to ensure that they comply with our Privacy Policy.

Internet security

As you know, data transmission over the Internet is not absolutely secure. We implement robust technical and organizational measures to ensure the security of your Personal Data in accordance with the requirements of current legislation and in particular the General Data Protection Regulation (RGPD).

All the information you entrust to us is stored on our secure servers or those of our subcontractors, access to and use of which are governed by our security policies and standards. When we give you (or you choose) a password to access certain sections of the CASHlib website, you are responsible for maintaining the confidentiality of that password and for complying with all other security procedures. We ask you not to reveal this password to anyone. The same applies to the unique Vouchers PIN code.

International data transfers

In cases where we transfer Personal Data from the European Economic Area (EEA) to a country outside the EEA or to a country that the European Commission considers does not ensure an adequate level of protection on the basis of Article 45 of the RGPD, we undertake to comply with specific additional measures to protect your Personal Data. These transfers will employ appropriate legal bases and mechanisms, such as standard contractual clauses approved by the European Commission, or other legal bases in line with current legislation as well as appropriate security measures.

Such international data transfers may occur, for example, when our suppliers transfer, store or access your data outside your country. Notwithstanding different legislation, we are committed to protecting your Personal Data in all circumstances in accordance with the terms set out in this Privacy Policy.

Data retention

The length of time we retain Personal Data depends on our contractual imperatives and legislative requirements. We retain your Personal Data for as long as is necessary for the purposes for which it was collected.

For example, we may keep the information you have provided for as long as is necessary for the proper performance of our contractual obligations and until the expiry of the period during which disputes are likely to arise in connection with our services, or as long as required by law. In the event that we use your Personal Data for more than one purpose, we will keep it until the expiry of the period corresponding to the longest purpose, but we will stop using it for the shorter purposes once the corresponding periods have expired in order to comply with a request to exercise your rights.

When personal data is no longer required, we either render it irreversibly anonymous (reserving the right to retain it and continue to use it in anonymous form), or destroy it permanently.

4. Information on exercising your rights

The right **to be informed**

You have the right to obtain clear, transparent, comprehensible and easily accessible information on how we use your Personal Data and on your rights. This is why we provide you with the information in this CASHlib Privacy Policy. To exercise your right to more information, please contact us by e-mail at . dpo@cashlib.com

Right of **access**

You have the right to access the Personal Data we hold about you, subject to certain restrictions. We may require payment of a reasonable fee, taking into account the administrative costs incurred in providing the information, or we may refuse to comply with your requests if they are manifestly unfounded, excessive or repeated and are likely to go unanswered. To exercise your right of access, please contact us by e-mail at . dpo@cashlib.com

The right of **rectification**

You have the right to demand that your Personal Data be rectified if it is inaccurate or out of date and/or be completed if it is incomplete. To exercise your right to rectification, please contact us by e-mail at dpo@cashlib.com . If you have an account, it may be easier to modify your own data via the "My CASHlib" function.

Right to **erasure/right to be forgotten**

In certain cases, you have the right to obtain the erasure or deletion of your Personal Data. This is not an absolute right, as we may be obliged to retain your Personal Data for legal or legitimate reasons. If you would like us to delete your data, please contact us by e-mail at . dpo@cashlib.com

The right to **object to commercial prospecting, including profiling**

You can unsubscribe or object to receiving our commercial prospecting messages at any time. Simply click on the "unsubscribe" link in any e-mail or communication We send you. You can also contact us by e-mail at . dpo@cashlib.com

The right to **withdraw consent at any time for consent-based processing of Personal Data**

You may withdraw your consent to the processing of your Personal Data if such processing is based on consent. Withdrawal of consent does not affect the lawfulness of the processing based on consent carried out prior to the withdrawal of consent. If you wish to withdraw your consent, please contact us by e-mail at . dpo@cashlib.com

The right to **object to the processing of Personal Data based on legitimate interest**

You may at any time object to the processing of your Personal Data where the processing is based on legitimate interest. However, please note that your Personal Data must be collected and processed in accordance with regulatory requirements relating to the fight against money laundering and the financing of terrorism when you use our vouchers. If you wish to exercise your right to object, please send an e-mail to . dpo@cashlib.com

The right to **lodge a complaint with a supervisory authority**

You have the right to lodge a complaint with the data protection authority in your country to challenge CASHlib's Personal Data protection and privacy practices. We invite you to contact us by e-mail at dpo@cashlib.com before lodging a complaint with the competent data protection authority.

The right to **portability of Personal Data**

You have the right to move, copy or transmit your data from our database to another. This applies only to data that you have provided, where processing is based on your consent or on a contract and is carried out using automated processes. For further information, please contact us by e-mail at . dpo@cashlib.com

The right to **limit processing**

You have the right to request that we limit the processing of your Personal Data.

This right means that the processing we carry out on your data is limited, so that we can keep this data, but not use or process it.

This right applies in specific circumstances provided for by the RGPD, namely: (I) the accuracy of the Personal Data is contested by the data subject (i.e. you), for a period allowing the controller (i.e. CASHlib) to verify the accuracy of the Personal Data, (II) the processing would be unlawful according to the data subject (i.e. you) and instead requires the restriction of their use, (III) the data controller (i.e. CASHlib) no longer requires the

Personal Data for the purposes of processing, but the data is still necessary for the data subject to establish, exercise or defend legal claims, (IV) the controller (i.e. CASHlib) no longer requires the Personal Data for processing purposes, but the Personal Data is still necessary for the data subject to establish, exercise or defend legal claims, or (V) the data subject (i.e. you) has objected to the processing based on the legitimate interests pursued by the controller (i.e. CASHlib) during the verification as to whether the legitimate grounds pursued by the controller prevail over those of the data subject. If you wish to request the restriction of processing, please contact us by e-mail at [.dpo@cashlib.com](mailto:dpo@cashlib.com)

The right to deactivate **Cookies**

You have the right to disable cookies.

Internet browser settings are usually set by default to accept cookies, but you can change this by modifying your browser settings. Many cookies are used to improve the usability and operation of the CASHlib website, so disabling cookies may prevent you from using certain parts of the site. If you wish to restrict or block all cookies deposited by the CASHlib website, you can do so by going to your browser settings. Your browser's Help function will tell you how to do this. For further information, please consult the following link. Alternatively, you can contact us by e-mail at [.dpo@cashlib.com](mailto:dpo@cashlib.com)

• **5. How to contact us 5. Complaints or questions about the processing of your personal data**

- If you have any questions or comments about the way in which we process and use your Personal Data, or if you wish to exercise any of your rights mentioned above, please contact us by e-mail at the following address dpo@cashlib.com.

6. Our Cookie Policy

We use cookies and tracking technologies on our Websites. To find out more about our use of cookies, please contact us by e-mail at [.dpo@cashlib.com](mailto:dpo@cashlib.com)

7. Changes to our Privacy Policy

We may amend this Privacy Policy from time to time. If we do, we will notify you by changing the date at the top of this policy and, in some

cases, we will provide additional notice by posting a statement on the home pages of the CASHlib website or by sending you an e-mail. We encourage you to review our Privacy and Cookie Policy whenever you interact with us to stay informed about our privacy practices, and to stay informed about the methods you can use to control the use of your personal data and protect your privacy.

Appendix 1: What is personal data?

Personal data" refers to any information that can identify you directly (e.g., your name) or indirectly (e.g., through pseudonymized data such as a unique identifier). This means that personal data includes information such as postal/email addresses, cell phone numbers, user names, profile photos, user-generated content, financial data and any information required to enable Us to offer you Vouchers. Personal data may also include unique numerical identifiers such as your computer's IP address and cookies.

Appendix 2: Information on the basis for processing Personal Data

Under EU data protection legislation, the use of personal data must be justified on the basis of a number of legal "grounds" and we are required to specify these grounds for each use of this policy. The following is an explanation of the scope of the available grounds. The bases used to justify each use of your information are indicated for each use in the "Use of your personal data" section of our Personal Data Protection Policy.

The main legal grounds for using your Personal Data are :

- **Consent:** you have consented to our use of your Personal Data) and you can withdraw your consent by using the "unsubscribe" option in our communications or you can email us at . dpo@cashlib.com
- **Contract performance:** your Personal Data is required to enter into and perform a contract, starting with the purchase of a Voucher.

- **Legal obligations:** we need to use your Personal Data to comply with our legal obligations.
- **Legitimate interests:** we use your Personal Data to fulfil a legitimate interest and our reasons for using it outweigh any infringement of your data protection rights.
- **Litigation:** your Personal Data is necessary to defend us, bring legal action or make a claim against you, us or a third party.