

## Surecomp Privacy Policy

We, at Surecomp Business Solutions Ltd. including our subsidiaries and affiliates (the “Company”, “we”, “us”, or “our”) are committed to protecting your personal information and your right to privacy. This privacy policy (the “Privacy Policy”) describes the ways we collect information from and about you, how we use it and what rights you have in relation to it, so that you may decide whether or not to provide information to us. If there are any terms in this Privacy Policy that you do not agree with, please discontinue use of our Services (as defined below). By purchasing our products and/or using our Services you agree to this Privacy Policy in addition to any other agreements we might have with you. In the event that such agreements contain terms that conflict with this Privacy Policy, the terms of those agreements will prevail. This Privacy Policy does not govern the practices of entities that our Company does not own or control, or entities that do not own or control our company or people that our Company does not employ or manage.

This Privacy Policy applies to all information collected through our cloud based services (such as APISure, our trade Finance as a Service or other services we may operate from time to time), our marketplace (available at <https://marketplace.surecomp.com/>), our website (available at [www.surecomp.com](http://www.surecomp.com)) and/or any related services, sales, or marketing activities (we refer to them collectively in this Privacy Policy as the “Services”).

**Please read this Privacy Policy carefully as it will help you make informed decisions about sharing your personal information with us and/or using our Services.**

This Privacy Policy forms part of our website and marketplace Terms of Use and uses the terms defined in the Terms of Use; accordingly, it must be read in conjunction with the Terms of Use and this Privacy Policy document is intended to add to the Terms of Use.

### WHAT INFORMATION DO WE COLLECT?

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

***In Short:** We collect personal information that you provide to us such as Personal Name, Email address, phone number, IP address and location, other personal information you may provide us as part of our correspondences in future, job application information submitted through our website and website usage data.*

We collect personal information that you voluntarily provide to us when registering to the Services, when you contact us through the Services, expressing an interest in obtaining information about us or our products and services, when we correspond with you as a customer or prospective customer, when participating in our activities or otherwise contacting us.

The personal information we collect can include the following:

Name and Contact Data. We collect your first and last name, email address, phone number, IP address, location and other similar contact data. We may also collect other personal information you may provide us as part of our correspondences. Further, we may receive information relating a job applicant employment status, position, salary and other related information as part of an online job application submission.

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:** Your IP address is collected automatically when you use our Services. Additionally, your browser and device characteristics may be collected when you use our website and marketplace.*

We automatically collect certain information when you use our Services. In addition, when you visit, use or navigate our website and marketplace, we may collect additional information relating to your browser and device characteristics, which may include operating system, language preferences, referring URLs, device name, country, location. This information does not reveal your specific identity (like your name or contact information) but may identify your personal identity when associated with other information you provide us.

The personal information that may be collected about you automatically may include the following:

- Browser type;
- Operating System;
- The end device you use;
- Language preferences;
- References;
- Location;

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- Use habits;
  - Browsing history;
  - Applications you have browsed;
  - Any action you made on our website and/or marketplace;
  - IP information.

This information is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes.

## HOW DO WE USE YOUR INFORMATION?

***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 Services for a variety of business purposes described below. We process your personal information for these purposes in reliance on our legitimate business interests (the “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.
- **To send you** (by us, or by any third party on our behalf) **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 as given when you have registered to our website and/or marketplace, or by making any other action on our website and/or marketplace. You can opt-out of our marketing emails at any time (see “Your Privacy Rights” below).
- **To send administrative information to you** for Business Purposes, Legal Reasons and/or possibly Contractual reasons. 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.
- **To protect our Services** for Business Purposes and/or Legal Reasons. We may use your information as part of our efforts to keep our Services safe and secure (for example, for data breach monitoring and prevention).
- **To enforce our terms, conditions and policies** for Business Purposes, Legal Reasons and/or Contractual reasons.
- **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.
- **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 Services, products, services, marketing and your experience.

You hereby authorize us to send reminder messages, or administrative notices regarding activities made via our website and/or marketplace or changes to the Company's policy documents. If you do not want to receive reminder messages, please send a message to the email address specified in this document specifying you do not want to receive such messages.

You hereby authorize us to retain your information in the Company's databases for the purposes set forth in this Section above.

In addition to the above, the Company may use the information collected in accordance with the provisions of this Policy or the provisions of any law for the following purposes:

- Improving customer service.
- Enable a customized user experience.
- Improving our Services, for example we may use feedback from users.
- Handling disputes.
- Addressing technical issues.

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- Displaying customized ads on our website and marketplace.
  - Providing you with products, services, upgrades and additional offerings available on our website.
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## **WILL YOUR INFORMATION BE SHARED WITH ANYONE?**

***In Short:** We only share information with your consent, to comply with legal requirements, or for Business Purposes, 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).
- **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.
- **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 may include: data analysis, email delivery, database management services, customer service and marketing efforts. We may allow selected third parties to use certain technologies on the Services, which will enable them to collect data about how you use the Services over time. This information may be used to, among other things, analyze and track data, determine the use of certain content and better understand online activity. ***Unless described in this Privacy Policy, we do not share, sell, transfer, rent or trade any of your information with third parties for their promotional purposes.***
- **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.
- **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 or other companies that we control or that are under common control with us.

You acknowledge that in order to provide you with access to our website and/or marketplace, we may transform your information to anonymized aggregated information. All anonymized aggregated information shall not be considered as your information and all rights to this data shall vest with us provided that we may not use such anonymized aggregated data in a manner that links any person or you to such anonymized aggregated information without your prior written approval.

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

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

Our website and/or marketplace use “Cookies” for its regular operation, including to collect statistics on the use of our website and/or marketplace, to verify details, to tailor the Site to your personal preferences and information security needs.

Modern browsers include the option of avoiding cookies. If you do not know how to do this, check the help file of the browser you are using.

The Company may allow other parties to manage the advertising in our website and/or marketplace. The ads you might expect when you visit our website and/or marketplace come from the same agencies' computers. To manage their advertisements, these factors place cookies on your computer. These cookies allow these factors to collect information about viewing the advertisements they have placed and which archives they have placed. The use these cookies make is subject to their privacy policy and not our website and/or marketplace privacy policy. See, for example, Google's privacy policy.

The Company may use remarketing to serve relevant and tailored publications to users who have already visited our website and/or marketplace (once and above). Through the use of remarketing, such users may view text, image ads, video, and other corporate media on third-party platforms, including on the social network “Facebook” and on

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Google's platforms (such as YouTube), the Google Display Network (GDN - Google Display Network) and / or through advertising tools, including "Adwords" and/or Adsense" and/or equivalent programs and tools.

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

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

Our servers are based on renown cloud providers located in Ireland or other locations as may be specifically requested by our customers. Please be aware that your information may be transferred to, stored, and processed by us in any other country in which our Company or agents or contractors maintain facilities, and by accessing our website or marketplace and using our Services, you consent to any such transfer of information outside of your country.

Surecomp is committed to subjecting all personal information received from European Union (EU) member countries, in reliance on the Standard Contractual Clauses Framework's applicable Principles.

## **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).

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.

## **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 Services is at your own risk. You should only access the services within a secure environment.

## **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, 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 Site. 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.

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

***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 contact us [DPO@surecomp.com](mailto:DPO@surecomp.com). 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.

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.

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**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.

**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. You can also opt-out by:

- Noting your preferences at the time you register your account with the Services.
- Logging into your account settings and updating your preferences.
- Contacting us using the contact information provided below

## CALIFORNIA RESIDENTS SPECIFIC PRIVACY RIGHTS

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

Surecomp may also be subject to the CCPA, the California consumer privacy law enacted in 2018, which extends to individual Californian consumers various rights that align to a significant degree with the rights granted to most European residents under the GDPR with respect to their personal data/information. If you are a consumer based in California, the rights you have include:

(i) **Right to Disclosure:** right to request Surecomp to disclose to you: (a) the categories of personal information collected by us; (b) the categories of sources from which the personal information is collected; (c) the business or commercial purpose for collecting or selling personal information (***please be noted that we don't sell your personal information***); (d) the categories of third parties with whom we share personal information; (e) the specific pieces of personal information we have collected about you, the consumer — in all cases upon a verifiable consumer request (“VCR”).

If we receive a verifiable consumer request (VCR) to access personal information, we will promptly take steps to disclose and deliver, free of charge, the personal information required by law, which may be delivered by mail or electronically. If delivered electronically. We are not required to respond to your VCRs more than twice in a 12-month period. You can make a VCR either by completing our contact form on our website, or sending such request to Surecomp's mailing address set forth at the end of this Privacy Policy.

(ii) **Right to Deletion:** We are required to disclose to you that you have the right to request that your personal information will be deleted. If a deletion VCR is received by us, we will delete your personal information from our records and direct any of our service providers to which we have provided such information to delete your personal information from their records. Notwithstanding the above, we are not required to comply with your VCR to delete personal information if we need to retain the personal information for the following purposes: (a) to complete the transaction for which personal information was collected, such as providing a product or Service requested you, or which is reasonably anticipated within the scope of our business relationship with you, or to perform a contract with you; (b) to detect security incidents, protect against malicious, deceptive, fraudulent or illegal activity, or prosecute those responsible for activity; (c) to debug to identify and repair errors that impair intended functionality; (d) to exercise our right to free speech or ensure the right of another consumer to exercise free speech or another right provided by law; (e) to comply with the California Electronic Communications Privacy Act; (f) to enable solely internal uses reasonably aligned with consumer expectations based on our business relationship with you; (g) to comply with a legal obligation; or (h) otherwise to use personal information internally in a lawful manner compatible with the context in which you provided the information.

(iii) **Non-Discrimination:** The CCPA requires that no subject business shall discriminate against you if you exercise your rights under this law, including by: (a) denying goods or services to you/the consumer; (b) charging different prices or rates for goods or services, whether through discounts, other benefits or imposing penalties; (c) providing a different level of goods or services, or suggesting that you will receive a different price, rate, level or quality of goods or services.

Our obligations to you under the CCPA will not prevent our ability to: (i) comply with federal, state or local laws; (ii) comply with civil, criminal or regulatory inquiry, investigation, subpoena or summons; (iii) cooperate with law enforcement agencies; (iv) exercise or defend legal claims; (v) use personal information that is deidentified or in the aggregate; (vi) collect personal information to extent every aspect takes place outside of California; (vii) avoid

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violation of an evidentiary privilege under California law, or provide personal information to a person covered by such a privilege.

**DO WE INTEND TO UPDATE THIS POLICY?**

*Yes.*

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.

**HOW CAN YOU CONTACT US ABOUT THIS POLICY?**

If you have questions or comments about this policy, email us at **[DPO@surecomp.com](mailto:DPO@surecomp.com)**.