# PRIVACY NOTICE

This notice applies to companies that are part of the Paysafe Group ("Paysafe" or "we" or "our").

Paysafe takes a "layered approach" to explaining its privacy practices, as recommended by many regulators. This is the short-form summary notice. Contact Us details are provided at the end of the notice, for feedback or any privacy enquiries you may have.

This notice shows our commitment to transparency and the protection of your privacy rights and sets out the basis on which any personal information we collect from you, or that you provide to us, will be processed by us. It applies to:

- the website/portal features and services provided to you when you visit our websites, portals or our payment panels our clients may use on their websites;
- when you apply to use and/or use Paysafe's products and services (including any loyalty or reward schemes, whether points-based or otherwise;
- your use of software including terminals, mobile and desktop applications provided by Paysafe;
  and
- email, other electronic messages including SMS, telephone, web chat, website/portal and other communications between you and Paysafe.

Together these are all referred to in this notice as "Services".

Please read the following carefully to understand our views and practices regarding your personal information and how we will treat it.

# INFORMATION WE MAY COLLECT FROM YOU

You may provide some information to us, for example when you enquire for or make an application for the Services, register to use and/or use any Services, by filling in forms on one of our websites, participating in one of our loyalty or promotional events or by corresponding with us by phone, e-mail, web chat or otherwise. We may collect some of it through automatic means, for example by using cookies when you visit our websites. Read our <a href="Cookie Policy">Cookie Policy</a> to know more. We may also obtain data about you from third parties, like credit reference and fraud prevention agencies. For more details and examples, please review the <a href="Comprehensive privacy notice">comprehensive privacy notice</a>, which also explains our use of any biometric, sensitive or special category personal data.

# USES MADE OF THE INFORMATION

We use information we collect about you to provide you with the products we offer, to notify you about changes to our products and to improve our products. Your information may also be used to contact you about your account, your use of the Services, to alert you to potential problems, as well as to respond to your questions to us. We also use this information to provide you with information about other products we or selected third parties offer which are similar to the ones you have used or exhibited interest in, or we think may be of interest to you. If you use one of our financial products, we will also use your information to assess your financial situation and to try to identify and prosecute possible frauds and other abuses of the financial system. For more details and examples, please review the comprehensive privacy notice.

# DISCLOSURE OF YOUR INFORMATION

We will not disclose your personal information to anyone except as described in this notice and the comprehensive privacy notice.

We may share your personal information with any company in the Paysafe Group of companies.

Your personal information (as necessary, but generally limited to full name and email address) may be shared with the recipient/sender of a payment in the context of the specific relevant transaction. We may share your personal information with third parties to provide you with the products we offer, including service providers, credit reference agencies and financial institutions. We may also share your personal information with third parties, including our or other applicable regulators and third parties you may have had dealings with, to prevent crime and reduce risk, if required to do so by law, where we deem it appropriate to do so, to respond to legal process, for the purpose of investigating a breach of third-party terms of business, or to protect the rights or property of Paysafe, our customers or others.

For more details, please review the <u>comprehensive privacy notice</u>.

#### WHERE WE STORE YOUR PERSONAL INFORMATION AND DATA SECURITY

The information that we collect from you may be transferred to, stored at and processed by recipients located in destinations outside the European Economic Area ("EEA"). These countries may have data protection standards that are different to (and, in some cases, lower than) those of the territory in which you reside. We will take reasonable steps to ensure that the recipients will use and protect your information in a secure manner.

If we have given you (or if you have chosen) a password, access code or any other secure means or access or authentication which enables you to access certain parts of our site, you are responsible for keeping this password confidential and complying with our instructions. You must not share credentials with anyone else, and you authorise Paysafe to act upon instructions and information from any person that enters your credentials.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your data transmitted to our site, unless you are communicating with us through a secure channel that we have provided. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

#### YOUR RIGHTS

Where applicable, you may have certain rights under data protection legislation, including the right to access, correct, update or delete your personal information; object to or restrict its processing; request to transfer certain of your personal information to another service provider (so called, data portability); or to revoke any consent you have given.

However, please note that there are exceptions to those rights. For the full explanation of the rights available, including further information on data retention, purposes of processing, types of personal information processed, CCPA rights for California residents and how we strive to keep your personal information safe, please refer to the <u>comprehensive privacy notice</u>. Privacy laws continue to develop and if you think or are unsure as to whether any right may apply to you, please also contact us, so we can assess and advise.

#### **AUTOMATED DECISION MAKING**

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without our human review.

For example, we may use automated decisions to complete a credit assessment on you when you apply for certain financial services of Paysafe, or to carry out anti-fraud checks on the transactions you perform. However, if you are in the EEA, you have the right to object the automated decision and have it

manually reviewed based also on information that you can provide.

Please refer to the <u>comprehensive privacy notice</u> for more details. You can contact us at the details below to exercise your right.

#### LEGAL BASIS FOR PROCESSING

We will generally process your personal information based on one of the following grounds:

- On the basis of your consent, for example to send you marketing messages to the extent consent is required by law;
- Where necessary to enter into a contract with you and perform our obligations under that contract:
- Where we have a legitimate interest, subject to such processing not overriding your own rights and freedoms;
- Where we have a legal obligation to collect your personal information or otherwise need your Personal Information to protect your vital interests or those of another person; or
- Exceptionally, when necessary in the public interest, for example when law enforcement agencies request information to investigate a crime.

For more details and examples, please review the comprehensive privacy notice.

# CHANGES TO OUR PRIVACY NOTICE

Any changes we may make to our privacy notice in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.