

## Privacy Policy

Date of last version of this Privacy Policy - September 2, 2020

The present document contains the privacy policy provided by WISE WIN LTD (hereinafter also "the Company") with respect to:

- the management and administration of website accessible via the link <https://wise.win> (Privacy Policy) and it regulates the data protection mechanisms provided by WISE WIN LTD to any user of the services and content accessible through website;

- the terms of your filing of applications for use or the use of the company's products and services (including any loyalty programs or remuneration schemes developed on the basis of bonus points accrual, etc.);

- your use of the software, including WISE WIN LTD mobile applications;

- E-mail, other electronic messages, including SMS, telephone conversations or Internet communication, website/portal and other types of information exchange between you and WISE WIN LTD.

Website is developed, managed, and administered by the WISE WIN LTD (WISE WIN LTD is a private company limited by shares, established and operating in accordance with the laws of England and Wales, company number 12811385, with seat and address of management: UNIT 111375, GROUND FLOOR, 30 BLOOMSBURY STREET, LONDON, WC1B 3QJ, UNITED KINGDOM).

Should any questions or concerns regarding the present Privacy Policy occur, you can contact the WISE WIN LTD using the following email address: [info@wise.win](mailto:info@wise.win) or the contact form provided at <https://wise.win/contact>.

## Your privacy

The [General Data Protection Regulation](#) (GDPR), which became applicable in the territory of the European Union since 25<sup>th</sup> May 2018, aims to protect your basic rights and freedoms as users of the services offered via website, mobile applications of WISE WIN LTD by setting requirements and measures in order to ensure your personal data protection at any given time.

As a data controller for the personal data processed through website, mobile applications, WISE WIN LTD deeply believes that protecting your privacy and other fundamental rights and the integrity and confidentiality of your personal data is an integral part of our values and aims.

One of your rights under EU law is that you must be informed when your personal data - also known as personal information - is processed (collected, used, stored, deleted and so on) by any organisation, including the institutions and bodies of the EU. You also have the right to know the details and purpose of that processing.

Some of the services offered require the processing of your personal data. The present document gives you information about the compliance measures we have taken to protect your rights and freedoms while respecting the principles of lawful, transparent and honest processing of personal data.

Here you can find out what kind of personal data we process, for what purposes and under what terms, with whom and under what conditions we share them. You can also read about how you can access your personal data and exercise the full amount of rights guaranteed by the General Data Protection Regulation.

Here we give you a general overview of some of the ways this website processes your personal data.

**At any time, you may exercise your right of objection to the processing of personal data relating to you by contacting us directly.**

#### **The personal data we process**

–WISE WIN LTD collects your personal information for the purpose of facilitating the provision of services through website, mobile applications.

–We put in place measures to guarantee that your data are kept up-to-date and processed securely.

–You have the right to access your personal information, to have it corrected and the right to recourse; at any time if you believe your data protection rights have been breached.

–We do not keep your personal information for longer than necessary for the purposes for which we collected it.

–However, we may keep your information for a longer period for historical, statistical or scientific purposes with the appropriate safeguards in place.

#### **Personal data we process**

The following personal data are processed:

##### *- information collected directly*

We receive and store any personal data (including financial information) that you provide to us, including when you (or your company) make a request in respect of WISE WIN LTD Services or apply for their receipt; get registered for the use of, and (or) use any WISE WIN LTD Services; download and (or) store information on our servers when using WISE WIN LTD Services; and contact us by E-mail, via SMS, website or portal, by phone or by other electronic means. Such information may contain references or refer to you or your clients and includes:

- full name, date of birth, E-mail address, invoice address, user name, password and (or) photo, address, ethnic origin and home country;

- initial account identifier, card expiration date, CVC data, bank details and (or) issuer data;

- information on any goods acquired, including the point of purchase, their cost, time and any feedback in respect of such purchase, including travel information if you or your client transfers money to pay for air tickets or other trip-related services;

- accrued or compensated bonus points or awards in any loyalty program;

The mentioned data is processed on the ground of Art. 6(1)(b) of GDPR.

- photos and videos from WISE WIN LTD events you have got registered for, for the purpose of their emailing to the event participants and publishing in our advertising materials for future events; and

- any other information provided by you or your clients;

#### *- Automatically collected information*

WISE WIN LTD automatically receives and stores certain information during your interaction with WISE WIN LTD, for example, using cookies or similar technologies.

#### *- Information from the third party*

We may receive information on you from other sources and add it to our information on your account. For example, we closely cooperate with and receive information from third parties, such as counter parties, financial institutions, shops, subcontractors providing financial, payment and delivery services, advertising agencies, analytical information suppliers, search information suppliers, credit bureau and fraud preventing agencies. To get a deeper insight into our clients and for the purpose of provision and development of WISE WIN LTD Services, we may study public comments and opinions in social networks (for instance, Facebook and Twitter).

Information on third parties: if you provide us information on third parties you must inform them of the same in advance (for example, provide them with this privacy policy) and make sure you have the right to do so.

#### *- Information collected via our applications*

if you download or use WISE WIN LTD mobile or desktop application, we may receive information on your location and location of your device or on the service you use (including

the place of a payment transaction). Some devices allow applications to access information on real-time location (for example, GPS (Global Positioning System)). When the function of real-time position location is activated, our mobile and desktop applications may collect such information from your mobile device or personal computer at any time you download or use our applications. We always try to inform you of our intention to receive information on your real-time location and, if so required by law, obtain your consent. We may use such information for regulatory purposes, to conduct our own full-scope audits, to get a more deep insight into the structure of transactions and ensure the best use of our services. E-mail and other means of communication: we may receive information on you and on your use of WISE WIN LTD Services when we communicate with each other and when you open our messages and use electronic identifiers (sometimes known as "digital device prints"), for example, IP addresses or phone numbers.

### **Personal data necessary for providing you with our newsletter**

We need your email to be able to send you our newsletter.

In case you confirm your email address finalizing the subscription process, it will be used for the purpose of receiving our newsletter and marketing materials. Our purpose for collecting the information is so we can provide you with a service and let you know about our most recent activities.

The legal basis we rely on for processing your personal data is your consent under article 6(1)(a) of the GDPR. We rely on your consent to process the personal data you provide to us for sending you this newsletter. You have the right to withdraw your consent, or to object to the processing of your personal data for this purpose at any time. You can do that by clicking on the 'unsubscribe' link at the bottom of each newsletter or by sending an email to: [info@wise.win](mailto:info@wise.win). If you do that, we are going to update our records immediately to reflect your preferences.

In case you do not consent to processing your email address for sending you our newsletter, you can still access the previous newsletters through website at <https://wise.win/unsubscribe>.

### **Purposes of processing**

We may use and transfer the personal data we collect for the following purpose:

- to identify, register and make further personalization of the communication between you, as a user, and us, as a data controller, providing access to the services for users;
- to provide WISE WIN LTD Services to you and your company, including the discharge of obligations of WISE WIN LTD to you and to financial or other institutions in connection with WISE WIN LTD Services provided to you (and (or) to your company). In this context, we: record and track the details of transactions concluded by you (and (or) your clients) in

connection with WISE WIN LTD Services; analyze and inform you (and (or) your clients) of participation in the Loyalty Program; encourage collection or write-off of any points or awards under any Loyalty Program; notify you of Important Changes or developments in respect of our website or our goods and services;

- to improve and develop our business, including, without limitation, improvement of our websites or portals, products and services. The above may include the use of information that you specify in the forms but do not communicate to us, for example, the use of such information to improve our website(s) and communication with you as part of support provision in respect of such form. We may also use your personal data to develop and test new products and services.

- to manage and exercise our rights, comply with the terms of use and any other contracts with you (and (or) with you company), including to manage any circumstances arising in connection with the challenging of transactions, fees or bonus points; to manage, investigate and regulate claims; to repay debts; or in case of your insolvency;

- to manage and reduce our credit risks. If you apply for the use of one of our financial products we evaluate your financial standing (and (or) financial standing of your entity) to the extent provided for in the applicable Terms of Use. Such verification of credit standing will also engage any related parties, such as directors, shareholders and managers. We may perform such actions by way of receiving and exchanging information with credit bureaus and fraud preventing agencies. Verification of credit standing will also engage any person sharing an account with you or having similar financial connection. If an application is a joint application and such connection exists no longer, it may be created. Such connections continue until you send a "separation notice" to credit rating agencies. Please note that the agencies record our requests, which may be viewed by other companies making their own credit requests; a "trace" may be left in your credit file, regardless of whether you have become a client or not. If you are a director, we will request credit bureaus to certify that the residential address you specified coincides with the address recorded in the company registers (if necessary). In addition to the above, during the provision of services, we provide information on your account maintenance to credit bureaus. If you do not repay your credits fully and on time, credit bureaus register the outstanding debt and may deliver such information to other entities carrying out similar checks. Such agencies keep these records for 6 years, regardless of the fact of discharge of your obligations. Please contact us for additional information on the use of credit bureau services by us.

- to prevent, identify and pursuit fraud or violations. WISE WIN LTD takes part in the initiatives aimed to combat fraud, which imply the assessment of you (and your clients) and monitoring of your transactions and (or) position location, to identify schemes requiring investigation, or to model and evaluate the possibility of fraudulent actions. Such tasks can be completed due to the use of third-party products and services. Besides, if you provide false or unreliable data on yourself, or if we identify or suspect commission of fraud or

breach, we may deliver such information to fraud preventing agencies and law-enforcement authorities and we may choose to file a suit;

- to avoid or reduce the risk of information safety;

• to deliver marketing messages in order to communicate to you information on the products and services that you requested or that, in our opinion, could be of interest to you; to get your feedback on our products, services and websites; as it pertains to marketing, marketing research and similar activities, we may use your personal data for such purposes, regardless of whether you have become our client or continue to receive WISE WIN LTD Services.

## Your Rights

### Right to access

You have the right to ask us for copies of your personal information. This right always applies. You can make a subject access request to find out what data is held and how it is used by using our contact form <https://wise.win/contact>. Please identify the following:

- what kind personal data you want to access, or would you like to access all your personal data we have;
- your name and contact details; and
- if you need the data in a specific format.

We may refuse your access request if your data includes information about another individual, except where the other individual has agreed to the disclosure, or it is reasonable to provide you with this information without the other individual's consent.

We are going to provide the requested information in the one-month term specified in Article 12(3) of the General Data Protection Regulation.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

### Right to erasure

You have the right to ask us to erase your personal information in certain circumstances. This is your so called 'right to be forgotten'. If you want to exercise this right of yours contact us via our contact form <https://wise.win/contact> and let us know what you want to be erased.

This right is not absolute so make sure your case follows under one of the following circumstances:

- we do not need your data anymore (example: you do not work for one of our Partners anymore);
- you initially consented to the use of your data, but have now withdrawn your consent (have in mind that this applies only to the personal data we process on the ground of your consent);

- you have objected to the use of your data, and your interests outweigh ours;
- we have a legal obligation to erase your data;
- you suspect we have used your data unlawfully.

If your request meets one of the above scenarios we will erase your data. We can refuse to erase your data on one of the grounds in Article 17(3) of the General Data Protection Regulation, namely if your data is necessary for reasons of:

- freedom of expression and information;
- legal obligation to keep your data;
- public health;
- establishing, exercising or defending legal claims;
- when erasing your data would prejudice scientific or historical research or archiving that is in the public interest.

If your request is justified, we are going to erase your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

### **Right to rectification**

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

If you want to exercise this right of yours contact us via our contact form <https://wise.win/contact> and let us know what data you want consider incorrect and how you want it to be amended.

When we receive your request, we are going to investigate the issue and either correct it or inform you why we consider the data accurate. We can also refuse on the ground of your request being “manifestly unfounded or excessive” which means it will cost us a significant amount of money or it will take a vast amount of resources.

If your request is justified, we are going to rectify your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation. In some cases we may need some extra time for investigation up to two more months but we will let you know about the delay in the initial one month period.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

### **Right to restriction of processing**

You have the right to ask us to restrict the processing of your information in certain circumstances. It may involve asking us to stop processing your data for a certain period of time, stop us processing your data in a certain way or even stop us deleting your data. In

any circumstances you can exercise your right by using our contact form <https://wise.win/contact>.

You may ask us to temporarily limit the use of your data when we are considering:

- a challenge you have made to the accuracy of your data;
- an objection you have made to the use of your data.

You may also ask us to limit the processing of your data but not deleting it if:

- processed your data unlawfully but you do not want them deleted;
- we no longer need your data, but you want us to keep it in order to create, exercise or defend legal claims.

What we will do to restrict the use of your data may include:

- temporarily moving your data to another system;
- making the data unavailable to users;
- temporarily removing it from website.

We will securely store your data and not use it unless:

- you give us your consent to do so;
- the data is needed for legal claims;
- the data is used to protect another person's rights;
- the data is used for reasons of important public interest.

We can refuse your request on the ground of being “manifestly unfounded or excessive” which means it will cost us a significant amount of money or it will take a vast amount of resources. If your request is justified, we are going to restrict the processing of your information in the one-month term specified in Article 12(3) of the General Data Protection Regulation. In some cases we may need some extra time for investigation up to two more months but we will let you know about the delay in the initial one month period.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

### **Right to object to processing**

You have the right to object to processing if we process your information on the ground of our legitimate interests.

If you feel we should stop processing your data on this ground, you can contact us and justify your reasons using our contact form <https://wise.win/contact>.

Note, however, that we may continue legitimately use despite your objection if we can prove we have a strong reason to process your data that overrides your objection.

If your request is justified, we are going to stop processing your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.



### Your right to data portability

You have the right to get your personal data from us in a way that is accessible and machine-readable. This right may seem similar to your right to access but it is only applicable to

- data that is held electronically;
- data you have provided to the organization.

Data you have provided does not just mean information you have typed in, such as a username or email address. It may also include such things as website or search usage history or traffic and location data.

If you want to exercise this right of yours contact us via our contact form <https://wise.win/contact>, indicating what kind of data you would like to receive from us in a machine-readable format.

Before sending you this data we may need to confirm your identity in order to prevent fraud and other people getting access to your data. Then we will provide it in the required format.

### Exercising your rights

If you wish to exercise any of your rights or receive additional information covered by this policy, you should send a letter at the address below marked with "For the attention of Data Protection Department" or at [info@wise.win](mailto:info@wise.win).

Responsibility for personal data protection rests with the person below, who may be contacted via a link to the Contact Us section or at the address given below:

WISE WIN LTD, UNIT 111375, GROUND FLOOR, 30 BLOOMSBURY STREET, LONDON, WC1B 3QJ, UNITED KINGDOM.

If you were not able to exercise one or more of your rights, you may contact the lead supervisory authority: Information Commissioner's Office and submit your complaint via:

Email: [dataprotectionfee@ico.org.uk](mailto:dataprotectionfee@ico.org.uk)

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

Website: <https://wise.win>

Nevertheless, we advise you to try and contact us on the matter first.

### Disclosure of your information

We do not disclose information that could help ascertain your identity, except as and

for the purposes described and defined herein, including:

- WISE WIN LTD, as part of assistance in provision of our services and for our internal client relationship management, for the purpose of report analysis and creation;

- credit bureaus (if it does not contradict the provisions of any Terms of Use or other contract), as described below. Please contact us for additional information on the use of credit bureau services by us.

- fraud preventing agencies, as described above, including Action Fraud, Financial Fraud Action and Financial Fraud Bureau;

- independent credit and financial institutions (if it does not contradict the provisions of the terms of use or other contract), including credit institutions where you (or your company) have opened one or several accounts, and payment systems regulating the issue of credit, debit, expenditure, purchasing or other payment cards, alternative payment systems and any other financial institutions that process payments and do not carry out their activities under WISE WIN LTD's control, or for whose actions or breaches WISE WIN LTD bears no responsibility;

- independent service providers, including providers assisting us in the provision of WISE WIN LTD Services, including order processing and execution, payment processing, credit risk management, safety risk, sector risk and fraud risk management, marketing research and polling on behalf of WISE WIN LTD;

- if it does not contradict the law, WISE WIN LTD - in accordance with such law - may be obliged to deliver information on you to regulatory and law-enforcement authorities all over the world, or we may otherwise determine the expediency or necessity of such actions. Such disclosure may include the requirements of governmental bodies or business entities you may have relations with, who intend to reduce fraud risks or as part of court proceedings or legal processes, for the purpose of national safety or when we believe that such disclosure is performed for the national or public benefit and such actions are legal;

- when passing control over an entity, WISE WIN LTD may acquire or sell business units or subsidiary companies. In this case we may deliver client information as a business asset. Without limiting the foregoing, if our company becomes part of a joint venture or is sold or merged with other entity, your personal data may be disclosed to our new business partners or owners. We, however, inform a recipient that information should be processed in compliance with the standards described in this policy;

- upon your consent, your personal data may also be used for other purposes, and your special permit shall be given thereto.

Except as required for the provision of services, as well as in accordance with the foregoing, WISE WIN LTD does not sell, lease, transfer or otherwise disclose information on

its clients to any third parties for business purposes.

### Monitoring

We may track or record telephone conversations, e-mails, web chats or other means of communication with you for regulatory, safety and quality improvement purposes, or for the organization of training programs. When you visit our offices, we may activate CCTV and access control and (or) other surveillance systems for safety provision, as well as for health and labor protection.

### Where your personal data is stored

We, our service providers and other parties, to which we provide your personal data (as described above), may process it outside the European Economic Area (EEA) and outside your home country. Personal data may also be processed by the staff employed by us or one of our suppliers located outside EEA or outside those territories where it was received. Such staff may, inter alia, be involved in the execution of guidelines, payment processing and service support during the provision of WISE WIN LTD Services. Such countries may have data protection standards in place that are different from similar standards adopted in your home country (they may be less strict in some cases).

In such cases, we assume necessary measures to protect your personal data in accordance with this privacy policy and the applicable data protection law, including the use of any respective means of safety provision ensuring legality of the international data transfer under such law. When entering into contractual relations with independent data recipients located outside EEA and receiving data from EEA for its processing outside EEA, WISE WIN LTD commonly includes "Model Clauses" adopted by European Commission.

### How we ensure your personal data safety

We have taken a number of measures aimed to protect your personal data against its accidental loss and unauthorized access, use, alteration and disclosure. Responsibility for safety and protection of your information also rests with you. If we have given you (or if you created) a password or access code to access certain sections of our website or portal or mobile applications, etc., you shall be responsible for the non-disclosure of such password and (or) access code. You must not disclose your password and (or) access code to anyone. You must exclude unauthorized use of your password and access code. WISE WIN LTD will act in compliance with the guidelines and information received from any person who specified your user ID and password and you realize that you are fully responsible for any use and other actions that may be committed when using your account. You should immediately notify WISE WIN LTD of the change in any data transferred to us.

Information transfer via the Internet is not completely safe. Despite our attempts to protect your personal data, we may not guarantee the safety of information transmitted to our website, except when you communicate with us via a protected channel provided by us.

On receiving your personal data, we comply with strict procedures and use safety provision functions excluding unauthorized access to such data.

### [Your personal data retention period](#)

The period of retention of your personal data depends on its nature and type, WISE WIN LTD Services and the country, in which they are provided, as well as on any applicable regulatory requirements and provisions of local legislation. As a rule, if such data is not needed any longer it is to be destroyed or depersonalized or aggregated with other data.

If you use WISE WIN LTD Services, we store your personal data for as long as the services you selected are provided. Usually it means that we store your personal data for as long as you continue to be our client and within a certain period thereafter. Upon termination of relationship, we are to store certain personal data within the period provided for by legislative and regulatory requirements of your home country. For instance, we store your personal data within the period prescribed by local legislation for filing a statement of claim (so called "action limitation period") or within the period prescribed by a court ruling, law-enforcement authorities or our regulators.

We may continue with our marketing emailing if it does not run contrary to the local legislation and in the absence of your refusal to receive such mails.

### [Automatic decision-making](#)

In some cases, our use of your personal data may lead to automatic decision-making (including evaluation), which may have a significant legal or other impact on you. Automatic decision-making means that a decision in your respect is taken automatically and is based on computer definition (using software algorithms) without human input. For instance, we use automatic decisions to evaluate your credit capacity when you apply for certain Services provided by WISE WIN LTD, or to perform audits aimed to prevent fraud as described in What Do We Use Your Personal Data For? section. We have taken measures to ensure protection of rights and interests of those persons whose personal data is used for automatic decision-making.

Besides, if you use WISE WIN LTD Services in the territory of the European Union, you are entitled to challenge any decision taken automatically, express your opinion and demand evaluation of such decision by humans. You may exercise this right by contacting us at the details specified below.

### [References on third-party websites](#)

We may, from time to time, publish references to the websites of our partners, advertising agents and subsidiary companies. When clicking such references, please note that these websites have their own privacy policies and cookie policies in place, and WISE WIN LTD does not assume any responsibility or obligations in respect of such third-party websites.

### [Changes in our privacy policy](#)

We may, for time to time, introduce changes in our privacy policy. When we make significant changes in respect of processing of your information, we shall notify you of the

same on this website or portal. The date of last changes made hereto is specified at the bottom of the page. You are responsible for regular visits to our website/portal and checking this privacy policy for any changes. However, if according to the law, we are required to specifically inform you of any changes herein and (or) obtain your consent to our use of your personal data, we shall act respectively.

*The present Privacy Policy is adopted with a decision of the Director of WISE WIN LTD's on 2 September 2020.*

*Any subsequent changes to the Privacy Policy shall be effective from the date indicated with the corresponding amendments.*