

VCash Solutions Inc. Privacy Policy

Effective: 02 April 2024 Last updated: 10 June 2024

VCash Solutions Inc. ("VCash") ensures continued protection of your personal information with our organizational, physical, and technical measures for data protection, including policies for evaluation, monitoring, and review of operations and security risks. This Privacy Policy governs the manner in which VCash collects, uses, maintains and discloses information collected from users (each, a "User") of https://vcash.ai/ ("Site"). This privacy policy applies to the Site and all products and services offered by VCash.

This Privacy Policy informs you of updates in our corporate policies regarding the collection, use, storage, disclosure, and disposal of personal information we receive and collect from customers, payees, users, and any individual who communicate, raise inquiries and concerns, as well as transact with us or through our authorized representatives, official websites and platforms, and web-based applications and channels. This Privacy Policy shall be subject to changes in our policies as well as legal and regulatory developments. We shall notify you of the changes by posting in our website and other means of communication for your information and reference.

Personal Identification Information

We may collect personal identification information from Users in a variety of ways, including, but not limited to, when Users visit our site, register on the site, and in connection with other activities, services, features or resources we make available on our Site. Users may be asked for, as appropriate, name, email address, mailing address, phone number. Except for minimum Know Your Client (KYC) information which are listed below, we will collect personal identification information from Users only if they voluntarily submit such information to us.

Users can always refuse to supply personally identification information, except that it may prevent them from engaging in certain Site related activities.

When using the VCash and other associated financial service, we may collect and use the following data about you:

- 1. Complete name;
- 2. Address, including country of residence;
- 3. Email address;
- 4. Mobile phone number or other contact information;
- 5. Date and Place of birth;
- 6. Proof of identity (e.g., driver's license, passport, or government-issued identity card);
- 7. Official Identification issued by a government; and
- 8. Other Personal Information or commercial and/or identification information that VCash, in its sole discretion, deems necessary to comply with its legal obligations under various Anti-Money Laundering (AML) obligations, such as those under the Anti-Money Laundering Act of 2001 (as amended), European Union's 4th AML Directive and the U.S. Bank Secrecy Act (BSA).



How We Use Collected Information

VCash may collect and use Users personal information for the following purposes:

To Process Account Verification

We may use the information Users provide about themselves for verification purposes for the Users account. We do not share this information with outside parties except to the extent necessary to provide the service.

To Send Periodic Emails

We may use the email address to respond to their inquiries, questions, and/or other requests as well as to send periodic emails that will inform users on the latest updates on the services and features of VCash.

When you create a VCash Account, you are agreeing to opt-in to all communications from us. We will provide you with an opportunity to opt-out of newsletter communications. We will never provide your Personal Information to third parties for direct marketing or other unrelated purposes without your written consent. Unfortunately, we are unable to allow you to opt-out of the emails we send you for certain legal, compliance or administrative purposes.

Profiling and Automated Decision Making

We may use Automated Decision Making (ADM) to improve your experience or help fight financial crime. For example, so that we can provide you with a fast and efficient service, we may use ADM to verify your identity documents, or to confirm the accuracy of the information you have provided to us. None of our ADM processes will adversely affect the privacy of your personal information.

Data Retention

As VCash is subject to various legal, compliance and reporting obligations, including AML requirements, we are required by law to store some of your personal and transactional data beyond the closure of your account with us. Your data is only accessed internally on a need to know basis, and it will only be accessed or processed if absolutely necessary. We will delete data that is no longer required by any relevant law or jurisdiction in which we operate.

How We Protect Your Information

We adopt appropriate data collection, storage and processing practices and security measures to protect against unauthorized access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our Site.

We restrict access of your Personal Information only to VCash employees, affiliates, and subcontractors who have a legitimate business need for accessing such information. We continuously educate and train our employees about the importance of confidentiality and privacy of customer information.

We maintain physical, electronic, and procedural safeguards that comply with the relevant laws and regulations to protect your Personal Information from unauthorized access.



We employ security products, such as firewall and data encryption, and other internal controls which are meant to safeguard all our servers and information systems, including the data stored in these systems. Sensitive and private data exchange between the Site and its Users are held safely and securely over a minimum of 128-bit SSL encryption.

Where we have a legal obligation to do so, we have appointed a Data Protection Officer (DPO) to be responsible for VCash's privacy program. If you have any questions about how we protect or use your Personal Information, you can contact our DPOs by email at dpo@vcash.ai.

Sharing Your Personal Information

We do not sell, trade, or rent Users personal identification information to others.

We never collect or maintain information at our Site from those we actually know are under 18, and no part of our website is structured to attract anyone under 18.

Data Storage

It is VCash's policy that all systems and storage medium or repositories that store customer data shall have completed the appropriate information security, risk, legal compliance, and privacy impact assessments. Your personal information shall only be stored in the environment that we can manage. Physical copies of documents containing your personal information shall be stored in physical vaults in a sealed and secure manner.

Personal Data Breach Management

Personal Data Breach refers to a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored, or otherwise processed. A Personal Data Breach shall be subject to notification requirements under the following conditions:

- 1. Compromised data involves personal data that may be used to enable identity fraud;
- 2. There is reason to believe that the information may have been acquired by an unauthorized person;
- 3. The unauthorized acquisition is likely to give rise to a real risk of serious harm to any affected data subject.

VCash shall notify the National Privacy Commission and affected customers in case of breach within 72 hours upon knowledge of or reasonable belief by the Bank or our third party processor that a personal data breach has occurred. If such event occurs, we shall notify you, through a secure means of communication, of the nature of the breach, your personal information possibly compromised, measures taken to address the breach and reduce negative consequences, contact details of government authorities concerned and our Data Protection Officer who can assist you in mitigating the possible ramifications that can compromise you and your right to privacy.



Cookies

When you use VCash's Services, we observe standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, "Cookies") on your computer or other devices used to visit VCash Services. We use Cookies to (i) help us recognize you as a customer, collect information about your use of VCash Services to better customize our services and content for you, and to collect information about your computer or other access devices to ensure our compliance with our Anti-Money Laundering and Combatting of Terrorist Financing obligations and (ii) ensure that your account security has not been compromised by detecting irregular or suspicious account activities.

We use both session and persistent Cookies. Session Cookies expire when you log out of your account or close your browser. Persistent Cookies remain on your computer or mobile device until deleted or otherwise expire. Most web browsers are set to accept Cookies by default. You are free to decline most of our session Cookies if your browser or browser add-on permits, but choosing to remove or disable our Cookies may interfere with your use and functionality of the VCash Services.

Right of Rectification

You have the right to correct any personal information We hold on you that is inaccurate, incorrect, or out of date.

Right of Erasure

You have the right to ask us to delete your data when it is no longer necessary, or no longer subject to a legal obligation to which VCash is subject to.

Portability

You may have the right to transfer certain of your personal data between data controllers, for example, to move your account details from one online platform to another.

Location Information

You may be able to stop the collection of location information through your device settings or by following the standard uninstall process to remove our applications from your device; however, because such data is used by us to optimize VCash's Services, meet legal requirements, as well as for ongoing fraud and risk monitoring purposes, choosing to remove or disable location services may interfere with your use and functionality of the VCash Services.



Access to Information

Subject to applicable laws, you may have the right to access information we hold about you. Your right of access can be exercised in accordance with the relevant data protection legislation. For further information, please contact support@vcash.ai.

Changes to this Privacy Policy

VCash has the discretion to update this privacy policy at any time. When we do so, we will revise the updated date at the bottom of this page. We encourage Users to frequently check this page for any changes to stay informed about how we are helping to protect the personal information we collect. You acknowledge and agree that it is your responsibility to review this Privacy Policy periodically and become aware of modifications.

Your Acceptance of these Terms

By using this Site, you signify your acceptance of this policy and terms of service. If you do not agree to this policy, please do not use our Site. Your continued use of the Site following the posting of changes to this policy will be deemed your acceptance of those changes.

Contacting Us

If you have any questions about this Privacy Policy, please contact us at: support@vcash.ai.