

Policy of Data Privacy

The purpose of the present privacy policy is to explain to the users of the mobile application offered by the payment institution (IoPn) how their personal data is collected and processed.

All data deemed to identify a user are considered personal data.

A – General Guidelines for Data Collection and Processing

The payment institution will make every effort to ensure the security and confidentiality of its customers' personal data in compliance with applicable laws, regulations, and the rule of law in place.

In accordance with the provisions of Organic Law No. 2004-63 of 27 July 2004 on the protection of personal data and CBT Circular No. 2020-11 of 31 May 2020 on the conditions for the provision of domestic mobile payment services, the collection and processing of data of users of the mobile application comply with the following principles:

- . Lawfulness, fairness and transparency: The data can be collected and processed only with the consent of the user who owns the data. Anytime personal data is collected, the user will be notified that his data was collected, and for what reasons it was used;
- . Limited purposes: The collection and processing of data is carried out to meet one or more purposes determined in the General Conditions of Use (GCU);
- . Minimization of data collection and processing: only the data deemed necessary for the proper execution of the objectives pursued by the application are collected;
- . Reduction in time of data retention: The data is kept for a limited period and the user is informed about that. When this information cannot be communicated, the user is informed of the criteria used thereof to determine the retention period;
- . Integrity and confidentiality of the data collected and processed: The person in charge of data treatment undertakes to guarantee the integrity and confidentiality of the data collected.

The collection and processing of personal data may only take place if they comply with at least one of the conditions listed below:

- . The user has expressly consented to the processing;
- . The processing is deemed necessary for the proper implementation of the contract;

- . The processing complies with a legal obligation;
- . The processing is explained by a necessity related to the protection of the vital interests of the person concerned, or of another natural person;
- . The processing may be explained by a necessity linked to the implementation of a task carried out in the public interest, or another one done as part of the exercise of official authority;
- . The processing and collection of personal data are necessary for the achievement of the goals of legitimate and private interests pursued by the person in charge of processing, or by a third party.

B – Identity of the Person in Charge of Data Processing

The Payment institution is a company with a limited eligibility under Tunisian law with a capital of five million Tunisian dinars, having its registered office in ... and is registered in the National Register of Companies (NRC) under the number: abcdefgK. Its website is: www.edp.com.tn and its phone number is: (+216) 71 aaa bbb.

The Payment institution appoints a representative responsible for the processing of the personal data of its customers. Access to this representative is possible by email at:

contact.donneesperso@edp.com.tn, and by phone on the number: (+216) nn nnn nnn.

In the event that the integrity, confidentiality or security of the customer's personal data is compromised, the person responsible for the processing undertakes to inform the customer by any means.

C – Purposes of Collecting and Processing Personal Data

Customers' personal data are collected and processed for the purposes of managing the payment account, and the associated means of payment; management of customer relationships; management of risks-in particular the operational risks-, management of money laundering, and the fight against terrorism; management of payment incidents; fraud prevention, management of commercial prospection and promotion, and the management of any other purposes related to the activity, or services offered to the customer.

D – Collection and Processing of Personal Data

In general, taking into account the level of payment account requested by the natural person customer, the data collected include: Surname, First name, identity document (ID) (type,

number, start date validity, end date validity, issuing authority), gender, birth (date and place), postal address, email address, national mobile phone number, and proofs of income.

In general, taking into account the level of payment account requested by the legal entity customer, the data collected involve: Company name, acronym, registration number in the national register of companies, legal form, creation (date and place), nature of activity, postal address, email address, telephone number, proofs of income.

Personal data is collected at the time of customer enrolment, updated when necessary, processed according to the business needs of the payment institution, non-transferable to third parties unless legally authorized, kept during the legal period and hosted securely in a production data center, and another remote backup site both located in Tunisia.

The customer has the right of access to his personal data and may also request that his data be updated or deleted.

He may also object, subject to justifying by a legitimate reason, to the processing of his personal data.

This opposition may be made in writing to the agencies (own agents) of the Payment institution, and may result in the impossibility for the Payment institution to provide the service(s) requested, or subscribed, or even the closure of the customer's account.

The Payment institution undertakes to respond to the request for opposition made by the customer within thirty (30) working days.

E – Requests for Information Concerning Suspicious Customer Transactions

The Payment institution is subject to criminal sanctions that punish money laundering and financing of terrorism. The customer accepts that the Payment institution may inquire with him regarding operations that will appear unusual in the aforementioned context. The customer undertakes to provide the Payment institution with all useful information on the context of these operations.