

PAYWISE'S PRIVACY POLICY

1. DEFINITIONS.

- 1.1. **PayWise, “We”, “Us”** – PayWise is a limited liability company duly incorporated pursuant to the laws of Trinidad and Tobago. PayWise owns and operates a mobile wallet, which allows persons to make payments in a safe and secure manner and a bill payments platform, which allows its agents to safely and securely execute bill payment transactions.
- 1.2. **Personal Data** – Any information relating to an identified or identifiable natural person and/or their business, such as, for example, a name, an identification number, location data or an online identifier etc.
- 1.3. **Data** – All information collected by or provided to PayWise, inclusive of personal data.
- 1.4. **Customer, “You”** – All persons, whether natural or legal, who use PayWise’s website, mobile wallet or services.
- 1.5. **Agent “You”** – All persons, whether natural or legal, appointed by PayWise to receive, collect and/or process bill payments.
- 1.6. **Website** – All references throughout this Privacy Policy to PayWise’s website is a reference to: <https://www.pwapp.co/>
- 1.7. **Mobile Wallet** – All references throughout this Privacy Policy to PayWise mobile wallet is a reference to the PayWise mobile wallet application which Customers and Agents can download through a relevant app store and sign up for a PayWise account.

2. GENERAL PROVISIONS.

- 2.1.** PayWise respects the privacy of its Customers and Agents and this Privacy Policy describes the types of data we receive and collect, how we use that data, with whom we share it, your rights and choices and how you can contact us about our privacy practices.
- 2.2.** PayWise has created this Privacy Policy to clearly set out the principles for receiving, collecting, storing, sharing and safeguarding the data, which comes into our possession. In light of the importance of this Privacy Policy we encourage you to take the time to read it carefully. If you do not agree to accept any provision of this Privacy Policy, you will not be able to use any of our services.

3. COLLECTION OF DATA.

- 3.1.** PayWise collects and stores your personal data, such as your:
- i.** Name/Business name;
 - ii.** Phone number;
 - iii.** Email address;
 - iv.** Residential address;
 - v.** Business address;
 - vi.** Banking information and bank account details;
 - vii.** Identification document details (such as your national identification card, drivers' permit and/or passport details);
 - viii.** Business registration documents and details; and
 - ix.** Utility bills and the information contained therein.
- 3.2.** PayWise also collects the following information:
- i.** Information about the services accessed by Customers;
 - ii.** Information about the services provided by Agents;
 - iii.** Financial information; and

iv. Your feedback.

3.3. Additionally, when you access our website or Mobile Wallet we collect your surfing and/or usage data. This data includes, for example, information about which device, browser and/or browser version you are using, when you accessed our website or Mobile Wallet, which operating system you use, from which website (link) you accessed our website, which elements of the website or Mobile Wallet you use, and how you use those elements. Your personal data are stored together with the IP address of the device you are using. This information serves to correctly display and optimise our website and Mobile Wallet, to protect them and to personalise your user experience.

4. PAYWISE'S USE AND DISCLOSURE OF DATA.

4.1. PayWise uses your data to communicate with you and third parties, to assess and improve its services and for market research and marketing.

4.2. PayWise does not sell or rent your data to marketers. We only share your data with trusted entities, as outlined below:

- i. PayWise employees, servants and/or agents** – PayWise shares your data with PayWise employees, servants and/or agents in order to provide our services and for internal administration purposes;
- ii. PayWise service providers** – PayWise shares your data with a limited number of our service providers. We have service providers that provide services on our behalf, such as website hosting, data analysis and auditing services. These service providers may need to access your data in order to perform their services. We authorise such service providers to use your data only as necessary to perform services on our behalf, or to comply with legal requirements. We require such service providers to contractually commit to protect the security and confidentiality of any data they process on our behalf.

iii. Legal Compliance – PayWise shares data as we believe necessary:

- a.** To comply with the laws of Trinidad and Tobago;
- b.** To enforce our contractual rights;
- c.** To protect the rights, privacy, safety and property of PayWise, you or others; and
- d.** Respond to requests from Courts of Law, law enforcement agencies, regulatory agencies, and other public and government authorities.

5. COOKIES.

- 5.1.** When you use our website, or open emails we send you, we obtain certain information using automated technologies, such as cookies, web server logs, web beacons, and other technologies.
- 5.2.** Cookies are small text files which are stored in the memory of your device via your browser. They store certain information (e.g. your preferred language or site settings), which your browser may (depending on the lifespan of the cookie) retransmit to us upon your next visit to our website.
- 5.3.** Most web browsers automatically accept cookies, however, you may delete, or disable cookies through your browser settings. If you delete or disable cookies please note that you may not be able to take full advantage of our website and your experience of our services may be impaired.
- 5.4.** A “web beacon,” also known as an internet tag, pixel tag, or clear GIF, is a tiny graphic image that may be used on our website or in our emails.
- 5.5.** We use these automated technologies to collect your device information and internet activity information. We use this data for statistical analysis, to understand user behaviour, to administer our website, to tailor the information presented to a user based on their preferences, and to improve user experience.

6. THIRD-PARTY ANALYTICAL SERVICES.

- 6.1.** On our website we may use Google Analytics, a web analysis service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, United States (“**Google**”).
- 6.2.** Google will analyse your use of our website on our behalf. The information collected by Google in connection with your use of our website (e.g. the referring URL, webpages visited by you, your browser type, your language settings, your operating system, your screen resolution, other webpages visited by you) will be transmitted to a server of Google in the United States, where it will be stored and analysed. The respective results will then be made available to us in anonymised form.
- 6.3.** At the time of publication of this privacy policy Google is certified under the EU-US Privacy Shield, which ensures that an adequate level of data protection is maintained with respect to the processing of data by Google in the United States.
- 6.4** PayWise may also use other analytical services that analyze website and mobile wallet usage in a manner similar to that expressed in paragraph 6.2.

7. SECURITY.

- 7.1.** PayWise makes reasonable efforts to ensure a level of security appropriate to the risk associated with the processing of your data. We maintain organisational, technical and administrative measures designed to protect data within our organisation against unauthorised access, destruction, loss, alteration or misuse.

8. RETENTION.

- 8.1.** We retain your data as long as we are providing services to you, or in the case of an Agent, as long as you are providing services to us. We also retain your data (even after services are no longer provided) to the extent necessary to comply with our legal and regulatory obligations and for the purpose of fraud monitoring, detection and

prevention. We also retain your data to comply with our tax, accounting, and financial obligations.

9. UPDATES TO THIS PRIVACY POLICY AND NOTIFICATIONS.

- 9.1.** We may update this Privacy Policy from time to time and when such an update is made we will post a revised version of this Privacy Policy on our website. Please note that updates take effect when they are posted and it is your responsibility to read the Privacy Policy from time to time in order to ensure that you are aware of any updates.
- 9.2.** We may provide you with alerts regarding updates to our Privacy Policy by posting them on our website or by contacting you through your email address. However, your continued use of our website and/or our services indicates your unequivocal agreement to and acceptance of the provisions of our Privacy Policy and any update/change to same.

10. CONTACT US.

- 10.1.** If You have any questions or complaints about this Privacy Policy, please contact us electronically or send physical mail to:

**PAYWISE LIMITED
Lot 136 James Terrace,
Maracas Gardens,
St. Joseph,
Trinidad.
West Indies.
Email: contact@paywise.co**