

PRIVACY POLICY – DRAFT

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1. INTRODUCTION

- 1.1. This is the Privacy Policy of TPlus Technologies Limited (referred to as “TPlus”, “we”, “us”, “The Company”), registered in Cyprus with registration number HE 390961, registered office at 148 Strovolos Avenue, 1st Floor, Strovolos 2048 Nicosia, Cyprus and email: info@tplus.io, has developed an app called ‘Rize app’ (the “app”).
- 1.2. The Company respects individuals’ rights to privacy and the protection of Personal Data. The Policy explains why we use your personal data, what information we collect and how we use it when you use our website or app and the services you can access through the app, and your rights if you want to change how we use your personal data.
- 1.3. Personal Data means any information relating to an identified or identifiable natural person (“Data Subject”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, economic, cultural or social identity of that natural person.
- 1.4. The Company may update this Policy from time to time. When we make any updates, we will communicate such updates to you and publish the updated Privacy Policy on our website at www.rizeapp.com.
- 1.5. In these terms and conditions the terms “Integrated Service Providers” or “Partners” are used and refer to either our affiliated Entities or Third parties which provide you services through the app.
- 1.6. We would encourage you to visit our website regularly to stay informed about the purpose of processing your Personal Data and your rights to control how we collect, use or process your Personal Data.
- 1.7. If you have concerns about how we use your personal data, you can contact us at info@tplus.io. We will communicate with you in English.

2. HOW YOUR PERSONAL DATA IS COLLECTED

- 2.1. Your Personal Data is collected:
 - From you;
 - From third parties – including subsidiaries or sister companies of the Company, integrated service providers established or located within and/or outside the EEA;
 - During our business relationship with you and the way you operate your account(s) including but not limited to your deposits and withdrawals;
 - From the technology that you use to access our services including location data from your mobile phone, or an IP address or telephone number and how you use it;
 - Credit reference and fraud prevention agencies;
 - Third-party authentication service providers for KYC and AML checks;
 - Official registers and databases;
 - Other Partners who help us provide our services;
 - Social media and other publicly available sources including the press, company registers and online search engines whatsoever.

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- 2.2. It is your duty and responsibility to provide us with updates as to the Personal Data provided in order for such Data to remain current, accurate and correct and you acknowledge that we rely on the Personal Data provided to us in carrying out our obligations, under the Law and our business relationship with you.

3. YOUR PERSONAL DATA WE HOLD ABOUT YOU

- 3.1. We collect the following types of information when you sign up for Rize app account, use our app and services provided through the app and interact with us:

- Basic Personal Data, including but not limited to name, residential address, date of birth, email address, telephone number, citizenship;
- Identification documents, such as a copy of your ID documentation or driving license, copies of any documents you have provided for identification purposes and any other information you provide to prove you are eligible to use our services;
- Your image in photo or video form (either as part of the KYC checks or where you upload a photo to your Rize app account);
- Technical information including but not limited to login information, Internet Protocol (IP) address, smart device information, mobile phone network information;
- Records of our discussions provided through our customer support channels, such as when you contact us or when we contact you by email, phone or through social media;
- Information on transactions relating to your Rize app account including but not limited to date, time, amount, beneficiary details of the merchant or ATMs associated with transactions;
- Details about how you use the app including but not limited to information about your visit, services you viewed, length of visits to certain services;
- Financial status information including but not limited to sources of income, gross income, net worth, transactional and trading history, deposits and withdrawal requests, financial needs and goals;
- Purpose and reason of account including but not limited to the nature of the transactions and the anticipated account turnover;
- Employment status information including the industry of employment and position of employment;
- Education information including but not limited to field of study and level of study;
- Information you give us, such as when completing a feedback survey or entering a promotion we are running.

- 3.2. If you give us personal data about other people (such as spouse of family), or you ask us to share their personal data with third parties, you confirm that you have brought this Policy to their attention beforehand.

- 3.3. The Company may also process biometric information, relating to the physical, physiological or behavioural characteristics of a person, including but not limited to using voice recognition or similar technologies whatsoever to prevent fraud and/or money laundering activities, only on the basis of an explicit consent granted by you or on any other legal basis.

4. PURPOSE AND REASON FOR USING YOUR DATA

- 4.1. We must have a legal basis (i.e. a valid reason) for collecting, using, processing and storing your personal data. This section explains on which reasoning we rely on when using and processing your personal data:

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- 4.2. **Contractual obligation:** We need certain information in order to provide our services and cannot provide them without this personal data.
- 4.3. **Legal obligation:** We are required by Law to collect certain information in order to provide our services to you. For example we are required to collect personal data in order to carry out checks in relation to Anti-money Laundering and terrorist financing, and sanction.
- 4.4. **Legitimate interest:** We may collect, process, use and store your personal data where it is in our legitimate interests and without prejudicing your interests or fundamental rights and freedoms. We may process your personal data to manage our business, financial affairs as well as to protect our employees, clients and property. It is in our interest to ensure that our processes and systems operate effectively and that we can continue operating as a business.
- 4.5. **Consent:** For research, statistical or marketing purposes we may only collect, use, process and store your personal data where an explicit consent has been granted for example when you have ticked a box to indicate you are happy for us to use your personal data in certain way. You can withdraw your consent at any time by unsubscribing any time you wish.
- 4.6. **Public interest:** For special category of data, such as sensitive personal data, we may only collect, use, process and store your personal data to adhere to government regulations and/or obligations.
- 4.7. Please note that if you do not agree to provide us with the requested personal data, we may be obliged to suspend the operation of your account and/or the services provided to you.

5. HOW WE USE YOUR PERSONAL DATA

- 5.1. We use your personal data so we can provide the best service, tell you about products and services you may be interested in and meet our contractual and legal obligations. More specifically we use your personal data to:
 - Check your identification documents as part of our KYC procedure to approve your application;
 - Confirm that you are eligible to use our application and services;
 - Meet our obligations relating to any transaction you want to make;
 - To give you details of our products and services and also assist in the development of new products and services;
 - Provide you customer support services;
 - Protect against fraud;
 - Perform marketing and provide you with new products and services that might interest you;
 - Manage our app and to be used for analysis, testing, research, statistical and survey purposes;
 - Help social interactions through the app and provide better experience;
 - Give you the option to use the contact list on your phone, so you can easily make payments to your contacts using the app;
 - Meet our legal obligations, enforcing our rights and other legal uses.

6. WHO WE SHARE YOUR DATA WITH

- 6.1. We will only use and share your Personal Data where it is necessary for us to lawfully carry out our business activities and/or provide our services. We will share your data with:
 - Subsidiaries and other group companies to provide you with the best possible services;

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- People or companies that you transfer money to;
 - Companies that provide services. We share your data with companies that help us provide the services you use and which you need to process details about you for this reason. These are:
 - a) Our e-money account, payment provider and card issuer, which is Modular. This Company provides the Wallet Services. Here is a link to Modulr’s Privacy Notice that will apply to you {..};
 - b) Integrated Service Providers. As part of the on-boarding process for the provision of trading or other services you will also be opening an account with Integrated Service Providers. We will transfer some of your personal data to these Integrated Service Providers during the onboarding process with them. We will provide you with the Privacy Policy of the Integrated Service Providers during the on-boarding process, which you will need to review, acknowledge and accept before the establishment of the business relation with these Providers and the provision of the services;
 - c) Data storage providers, which include Amazon AWS;
 - d) Software, platform support and cloud hosting companies;
 - e) With Payment Service Provider (“PSPs”);
 - f) Affiliates, Tied Agents and/or Business Introducers established or located within or outside EEA;
 - g) Third Party providers that we use to send and receive communications from you in order to provide our customer support (Freshesk) and to send communications (such as legal, service and marketing) by email (Microsoft and/or Sendgrid).
 - h) Our KYC and AML service providers that help us comply with our regulatory obligations;
 - i) Companies involved in making and dispatching our Rizeapp cards;
 - j) Companies that help us with software development and functional analytics (for example to help us solve technical issues with the app);
 - k) Companies that help us with marketing like social media and advertising companies.
 - Credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client. To do so they may check your details supplied against any particulars on any database (public or otherwise) to which they have access. They may also use your details in the future to assist other companies for verification purposes. A record of the search will be retained by the Company;
 - With any of the Company’s professional advisors provided that in each case the relevant professional shall be informed about the confidential nature of such Data and commit to the confidentiality obligations herein as well;
 - With other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use your Personal Data or get in touch with you;
 - Market research organisations that provide telephone or email surveys with the purpose to improve the services of the Company. In such cases only the contact details will be provided;
 - With internal and external auditors whatsoever;
 - Law enforcement agencies like competent authorities, police courts and other external parties.
- 6.2. You accept and acknowledge that the Company is required to disclose Personal Data reportable under the CRS Decree. The Company is undertaking all reasonable steps in relation to maintaining compliance with CRS and may ask you from time to time for additional information so that it can maintain appropriate records.

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- 6.3. Our third-parties to which we share and/or transfer your Personal Data are not allowed to use or disclose or share whatsoever for any other purpose other than the purpose of providing services, as agreed, to us.
- 6.4. We will not disclose to any third party your Personal Data for its own marketing purposes without your consent.
- 6.5. Please note that your Personal Data is shared, transferred, collected, processed and stored in the following countries (EEA and non-EEA): Cyprus, Ireland, Ukraine, Israel and your country of residence.
- 6.6. If you would like a copy of your Personal Data held by the third parties or if you want to receive more details on how your Personal Data is collected, used, processed or stored by the third parties please contact us at info@tplus.io or at our office address: 148 Strovolos Avenue, 1st Floor, Strovolos 2048 Nicosia, Cyprus.

7. YOUR RIGHTS

- 7.1. The Company takes all the appropriate measures to make sure that you are fully informed about your rights in regards with all Personal Data we collect, process, use and store.
- 7.2. In the event you wish to exercise any of the rights described below or if you have any queries about how we collect, use, process or store your Personal Data that are not answered in this Privacy Policy, or if you wish to complain to our Data Protection Officer, please contact us at info@tplus.io or at our office address: 148 Strovolos Avenue, 1st Floor, Strovolos 2048 Nicosia, Cyprus.
- 7.3. Please note that in some cases, if you do not agree to the way we collect, use, process or store your Personal Data, it may not be possible for us to continue providing you access to our app or to provide you with our services and as a result your account will be suspended and/or closed.
- 7.4. All rights and the circumstances under which such rights may be exercised are described in the table below:

RIGHTS	EXPLANATION
Access – You have the right to get access to the Personal Data including the records of any and all telephone conversations, email and/or text message correspondence, between you and the Company, held by the Company	If you would like a copy of your Personal Data held by the Company, please contact us at info@tplus.io or at our office address: 148 Strovolos Avenue, 1st Floor, Strovolos 2048 Nicosia, Cyprus.
Rectification – You have a right to rectification of inaccurate Personal Data and to update incomplete Personal Data.	In case you believe that any of the Personal Data held by the Company is inaccurate, you are entitled to request to restrict the processing of that Personal Data and rectify the inaccuracies. Please note that if you request us to restrict processing your Personal Data we may have to suspend the operation of your account and/or the services and/or products provided.

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<p>Erasure – You have a right to request to delete your Personal Data.</p>	<p>You may request to delete your Personal Data in case you believe that:</p> <ul style="list-style-type: none">• the Company no longer needs to process your Personal Data for the purposes for which it was provided;• the Company requested your consent to process your Personal Data but you withdraw your consent;• the Company is not using your Personal Data in a lawful manner. Please note that if you request us to restrict processing your Personal Data we may have to suspend the operation of your account and/or the services and/or products.
<p>Restriction – You have a right to request us to restrict the processing of your Personal Data.</p>	<p>You may request us to restrict processing your Personal Data in case you believe that:</p> <ul style="list-style-type: none">• any of your Personal Data held by the Company is inaccurate;• the Company no longer needs to process your Personal Data for the purposes for which it was provided, but you require such Data to establish, exercise or defend legal proceedings;• the Company is not using your Data in a lawful manner. Please note that if you request us to restrict processing your Personal Data we may have to suspend the operation of your account and/or the services and/or products provided.
<p>Portability – You have a right to data portability.</p>	<p>Where the Company asks for your permission in order to process your Personal Data or where you have provided us with Data for the purposes of entering into a contract with us, you have a right to receive the Personal Data you provided to us in a portable format. Where it is feasible, you may also request us to provide it directly to third parties. However, in such case the Company shall not be responsible for any such third parties' use of your Personal Data, which will be governed by their agreement with you and any privacy statement they provide to you.</p>
<p>Objection – You have a right to object to the processing of your Personal Data.</p>	<p>You have a right to object to us processing your Personal Data on the basis of the legitimate interest– unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests, or where we</p>

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	need to process your Personal Data to investigate and protect us or others from legal proceedings.
Marketing – You have a right to object to direct marketing.	You have a right to object at any time to collect, use, process or store your Personal Data for direct marketing purposes, including profiling you for the purposes of direct marketing.
Withdraw consent – You have a right to withdraw your consent	In case in which the Company relies on your permission to process your Personal Data, you have a right to withdraw your consent at any time by sending a written request at info@tplus.io or at our office address: 148 Strovolos Avenue, 1st Floor, Strovolos 2048 Nicosia, Cyprus. The Company is always making it clear where a consent is required in order to process your Personal Data.
Raise a complaint – You have a right to raise a complaint with the Data Protection Commissioner’s Office	If you wish to make a complaint, you can contact our Data Protection Officer who will investigate the matter.
Not be subject to automated decision-making processing (including profiling) – You have the right not to be subject to automated decision making.	Even though you have the right not to be subject to a decision, based solely on automated processing of Personal Data the Company takes an automated-decision by processing your Personal Data as described in this Policy in the following cases: <ul style="list-style-type: none">• Obtaining your IP address;• Scoring your assessment test;• Verifying the authenticity and validity of identification documents including but not limited to passport, identity card, driver’s license, using credit reference and fraud prevention.

8. CHANGES TO THE WAY WE USE CLIENT’S PERSONAL DATA

- 8.1. The Company reserves the right to change the way and/or the purpose of processing and use of your Personal Data.
- 8.2. As a result, where the Company decides to process or use your Personal Data for purpose other than the purpose for which such Personal Data were initially collected, processed and used and stored, it shall provide you with all relevant information of such change including the new purpose under which such Personal Data will be used and/or processed as well as all of your rights as described in this Privacy Policy.

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8.3. Please note that if you do not agree to such changes of processing your Data, we may have to suspend the operation of your account and/or the services and/or products provided to you.

9. COMMUNICATION

9.1. We may directly contact you to provide you with information in regards to the operation and maintenance of your account including updated information about how we collect, use, process and store your Personal Data by telephone, email or otherwise.

10. TRASFERING THE INFORMATION OUTSIDE THE REPUBLIC OF CYPRUS

10.1. We may share or transfer your Personal Data to organisations including Company's subsidiaries or group companies in other countries only if we ensure that such organisations maintain the same or equivalent Personal Data protective measures in accordance with the Laws.

10.2. In the event that we share or disclose Personal Data to countries outside of the EEA we will only do so where:

- the European Commission has decided that the country or the organisation we are sharing your Personal Data with will protect your Data adequately;
- the transfer has been authorised by the relevant data protection authority;
- we have entered into a contract with the organisation with which we are sharing your Personal Data (on terms approved by the European Commission) to ensure your Personal Data is adequately protected.

11. MARKETING MATERIAL

11.1. We will not contact you at your telephone number or via email and/or by any other means to provide you with information about our services provided through the Rize app or to provide you with any other marketing material, unless you expressly instruct us to do so, or unless we are permitted under the Data Protection Laws to do so.

11.2. You may unsubscribe anytime by clicking the unsubscribe link located on our electronic commercial information or by written request at info@tplus.io or at our office address: 148 Strovolos Avenue, 1st Floor, Strovolos 2048 Nicosia, Cyprus.

12. MONITORING OF CALLS, EMAILS, TEXT MESSAGES AND OTHER COMMUNICATION

12.1. We may monitor or record calls, emails, text messages or other communications as described in this Privacy Notice. Such recordings may comprise conclusive evidence of requests or conversations. You have the right to request, and the Company upon such request, to provide you with such records.

13. HOW LONG WE STORE YOUR DATA

13.1. We will store your Personal Data for as long as it is required for legal or business purposes. We are obliged by law to retain your Personal Data for five (5) years or more if needed, after the termination of our Client Agreement. When your Personal Data is not needed, we securely delete or destroy it.

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14. COOKIE POLICY

- 14.1. Cookies are small packages that a website stores on your computer or any other electronic device when you visit a website to enable you to perform numerous functions on the website as well as to regulate the content to your preferences. As a result, the Company uses cookies to ensure that the performance and the functionality of its website is robust and enhanced. Please visit our website to read our Cookie Policy

15. SECURITY INFORMATION

- 15.1. We are committed to ensuring that your Personal Data is secure with us and with the third parties who act on our behalf. For more information about the steps we are taking to protect your Personal Data please contact us at info@tplus.io or at our office address: 148 Strovolos Avenue, 1st Floor, Strovolos 2048 Nicosia, Cyprus.

16. HOW TO MAKE A COMPLAINT

- 16.1. If you have a complaint about how we use your personal information, please contact us by emailing info@tplus.io. We will communicate with you in English and you should let us know if any of your contact details change.
- 16.2. Complaints If you're still not happy you can raise your complaint to the Data Protection Commissioner's Office. For more details please visit the website at www.dataprotection.gov.cy/.