

Safe-Voucher Ltd

Trading as Neosurf

Data Protection Policy v3.0

January 2023

“Safe-Voucher”, “the company”, “we”, “us” or “our”, refers to Safe-Voucher Ltd, a company registered in England and Wales under Company Number 13696568, and which operates in the UK.

This policy describes the way we collect, store, use and protect your personal information. This policy was last reviewed/revised in January 2022. We may amend this policy at any time by posting a revised version on our website. The revised version will be effective at the time we post it. If the revised version includes a substantial change, we will provide you with 30 days' prior notice by posting notice of the change on the "Policy" page of our website.

The following topics are covered in this policy:

Collection and Usage of Information

The type of information we collect about you varies depending upon the nature of the products and services we provide you. We use personal information only for the purpose for which we tell you that it has been collected, for other legitimate purposes as permitted by data protection law, and retain it only as long as necessary for those uses or required by Law.

1. Browsing the Websites:

When you browse the company's website (including the payment application), we may collect information regarding the domain and host from which you access the Internet, the Internet Protocol addresses of the computer or Internet Service Provider you are using, and anonymous site statistical data. This information is collected for the purpose of assessing the effectiveness of the company's website and for security reasons.

We also gather, store and process information in order to be able to provide you with better services and customised information and communication. For this purpose, we use so-called cookies in several places. The cookies serve to make our service more user-friendly, effective and secure. Cookies are small text files that are filed on your

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computer and that your browser stores. We use persistent cookies to determine whether there has been communication in the past between your computer and us. Persistent cookies stay on your hard disk until they are deleted or expire automatically. Most browsers automatically accept cookies. You can prevent cookies from being stored on your hard disk by changing your browser settings to "do not allow cookies". For detailed instructions on how to do this, please consult your browser manual. You may delete cookies that are stored on your hard disk at any time.

2. Enquires:

The website contains various names, company email addresses, and fax numbers that you may use to solicit information about the website, our services, and the company in general. When you send us an email or contact us by telephone, we may store the enquiries and their contents, including any personally identifiable information you may have provided. Any personally identifiable information you submit via an enquiry is collected only with your knowledge and active participation.

3. Customer feedback/surveys:

We may invite you to participate in customer surveys or provide your feedback on our products and services. We will use any information you provide only to make improvements to our products and services and not for any other purpose unless we inform you of our intention to do so and you provide your consent.

4. Newsletter subscription:

Customers will now receive our newsletter, which offers the latest Safe-Voucher information. Customers will also benefit from special promotions during which we give away Safe-Voucher credit to try out our latest offers – such as games, music downloads and Internet telephony.

It is our top priority to protect customers' privacy. It is therefore important to us that customers know when we gather and use which data. The information that customers entered when registering for the newsletter will only be used in connection with drawing up and sending our mailings and in keeping with the latest data protection regulations. All customers' data will, of course, be treated strictly confidentially. To this end, we have put into place all necessary and available technical and organisational measures.

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We endeavor to keep customers' data safe within the framework of the latest data protection regulations. We, therefore, improve our safety measures regularly in line with technological development and regulations such as the GDPR.

You can revoke your consent about the use of your personal data at any time. The revocation can be made using the unsubscribe function, for instance, which is provided at the bottom of each newsletter. Once a customer has unsubscribed, all their data will be removed from our mailing list.

We reserve the right to change this data protection declaration at any time in keeping with the latest data protection regulations.

If you have any questions, please do not hesitate to contact us at support.uk@neosurf.com.

5. Transaction:

The Safe-Voucher process of a payment transaction initiated by an end-customer to their myNeosurf account or from a website verifying a voucher transaction may require us to collect some personal data. This personal data is processed in a secure and encrypted manner. The data is collected by the website accepting a customer's voucher payment or directly by the customer entering payment details for their myNeosurf account. This information is needed for our legal obligations of transaction tracking. They can be used to answer requisitions from authorities.

6. Other:

We may collect additional information from or about you in other ways not specifically described here. For example, we may collect information related to contact with our customer support team or in cases where a direct-to-bank account refund is requested.

Compliance with GDPR

Safe-Voucher Ltd is a company that complies with the General Data Protection Regulation (GDPR). We act as Data Controllers, as defined under the GDPR, and process personal data based on our legitimate interests and for contractual necessity in providing you services.

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Exercising Your Data Rights

Users in certain locations may have rights under the General Data Protection Regulation (GDPR) or under the California Consumer Privacy Act (CCPA) regarding data that Safe-Voucher controls as a Data Controller as defined under the GDPR, including:

- The right of access to their personal data.
- The right to correct or rectify any inaccurate personal data.
- The right to restrict or oppose the processing of personal data.
- The right to erase or delete their personal data.
- The right to personal data portability.

You can exercise rights over your data via Safe-Voucher in the following ways:

- Writing to us at Safe-Voucher Ltd.
- Send a mail to support.uk@neosurf.com

How We Protect and Store Information

We store and process customer information on our servers, and we protect it by maintaining physical, electronic and procedural safeguards in compliance with the applicable Law. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorise access to information only for those employees who require it to fulfil their job responsibilities.

We do not pass on any data to third parties - unless we are legally obligated by the Police, Court Order or if passing on data is necessary because of fraudulent access to our Internet infrastructure to take legal action. We will not pass on any data for other purposes - either commercial or not. We gather, store and process information in order to provide you with better service and individual information and communication. Furthermore, customers have the right to access the personal data stored about them,

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their origin and the purpose of their storage. You can request information about these stored data by sending an email to support.uk@neosurf.com.

Please note, however, that - despite our high-security standards - information that you voluntarily release over the Internet can be used by others. Safe-Voucher is therefore not liable or responsible for the disclosure of information due to data transmission errors and/or unauthorised access by third parties.

How We Share Information with Other Parties

We may share information with:

Law enforcement, Financial Supervision Authorities, government officials, or other third parties when:

- We are compelled to do so by a subpoena, court order or similar legal procedures.
- We need to do so to comply with the Law.
- We believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity, or for investigations.

Merchant/Distributor may share information with us for the same reasons.

We will not sell or rent any of your information to third parties for their marketing purposes and only share your personal information with third parties as described in this policy.

We will not transfer your personal information outside of the European Economic Area unless we need to do so in respect of a specific service which you buy from us or we are required to do so by law.

We will not share your personal information with any third parties for marketing purposes without obtaining your prior permission to do so.

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Access to your information and correction

Customers have the right to request a copy of some or all of the personal information we hold about them. If you would like a copy, please use the contact details given at the end of this policy. We may ask you to confirm additional information to enable us to identify all of the information we hold.

We want to make sure that your personal information is accurate and up to date. Please use the contact details given at the end of this policy if you would like us to correct or remove information that you think is inaccurate.

Anti-Money Laundering and Counter-Terrorist Financing Statement

As a company with a global presence, Safe-Voucher Ltd is committed to full compliance with all applicable laws and regulations regarding Anti-Money Laundering ("AML"). Safe-Voucher's policy is to prevent people engaged in money laundering, fraud and other financial crimes, including terrorist financing, from using our services.

Safe-Voucher has robust policies and procedures to detect, prevent and report suspicious activity. To comply with OFAC (Office of Foreign Asset Control) requirements and global sanctions, we screen applicable collected information against government watch lists. In addition, we may request that you provide us with documentation to help prove your identity or for business verification purposes. When a customer registers for an account, we require email and mobile verification for transactions up to £100. We require identity documents and proof of address for transactions over £100, and for any refunds. We report suspicious transactions to the financial intelligence unit in the respective country where we have an obligation to.

How to Contact Us about Privacy Questions

If you have questions or concerns regarding this policy, you should contact us via email at: support.uk@neosurf.com.