

WOLI Services Limited

WOLI Privacy Policy

Effective from: Oct 23, 2023

WOLI PRIVACY POLICY

Data privacy is of high importance for Woli and we want to be open and transparent with our processing of your personal data. We therefore have a policy setting out how your personal data will be processed and protected.

Who is the controller of your personal data?

The company “**WOLI SERVICES LTD**” (hereinafter referred to as “**Woli**”) is the controller of your personal data under applicable law. Address: Mnasiadou & Strasikratous 10 ELMA HOUSE, 2nd Floor, 1065, Nicosia Cyprus company registration number HE411043, VAT number 10411043W. Contact e-mail for personal data issues: compliance@woli.io.

Woli cooperates with “Paynetics AD” (“Paynetics”), with seat and management address: Sofia, Sofia Municipality, commune of Losenets, 76-A, James Bourchier Blvd., ground floor, entered in the Commercial Register and Register of Non-Profit Legal Entities maintained by the Registry Agency under UIN No. 31574695. Paynetics is an Electronic Money Institution, holder of a relevant license which enables it to issue and distribute e-money, issued by the Governing board of Bulgarian National Bank with Decision № 44 from 11 Април 2016 and is entered into the register kept by Bulgarian National Bank which may be found here. Bulgarian National Bank supervises the activity of Paynetics. Paynetics is registered as an administrator of personal data with Certificate № 3721 / 25.01.2015 in the Commission for Personal Data Protection. By accepting this privacy policy you also accept Paynetic’s Privacy Policy which is available [here](#), which forms an integral part of this privacy policy.

In some cases described below, Woli acts as processor of Paynetics, the latter being the sole controller of your personal data.

Where do we store your data?

Unless otherwise provided in this Privacy Notice, the data we collect from you is stored within the European Economic Area.

Your rights

Right to access:

You have the right to request information about the personal data we hold on you at any time. For this purpose, you can send us an e-mail to compliance@woli.io

Right to portability:

Whenever Woli processes your personal data by automated means based on your consent or based on an agreement, you have the right to get a copy of your data in a structured, commonly used and

machine-readable format. You can also request to have your data transferred to a third person. This only includes the personal data you have submitted to us. In order to exercise the above right you can send us an e-mail at compliance@woli.io

Right to rectification:

You have the right to request rectification of your personal data if the information is incorrect, including the right to have incomplete personal data completed. If you have a Woli account, you can edit your personal data under your account. You can also send us an e-mail at dcompliance@woli.io

Right to erasure:

You have the right to ask for your personal data, which are processed by Woli, to be erased at any time, especially when:

- Your personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed
- The processing of your data is based on your consent and you withdraw that consent
- Your data has been illegally processed.
- The above right does not exist in particular where:
- The processing of your data is necessary to establish, exercise or defend legal rights
- The processing of your data is necessary to comply with a legal obligation of Woli that requires processing.

In any case, we will notify you whether or not your claim is satisfied and, in the event of non-satisfaction, the reasons involved in it. In order to exercise the above right, you can send us an e-mail at compliance@woli.io

Right to object:

You have the right to object to the processing of your personal data which is based on legitimate interest of Woli. In that case, we will not continue to process the personal data unless we can demonstrate compelling and legitimate grounds for the processing which overrides your interest and rights or to establish, exercise or defend legal rights. In order to exercise the above right, you can send us an e-mail at compliance@woli.io

Right to object to direct marketing:

You have the right to object to the processing of your personal data for direct marketing purposes. You can state your preference by the following means:

- following the instruction in each marketing e-mail
- sending an e-mail to compliance@woli.io

Right to restriction:

You have the right to request the restriction of processing of your personal data under the following circumstances:

- If you question the accuracy of your personal data and until Woli verifies their accuracy.

- If processing of your data is unlawful and you object to their erasure by asking instead of restriction of their use.
- If Woli no longer needs your personal data for the purpose of processing, but the data is necessary to establish, exercise or defend legal rights
- If you object to the processing of your data by Woli which is based on legitimate interest of the latter and until the existence of Woli's legitimate grounds overriding your freedoms or rights has been verified.

In order to exercise the above right, you can send us an e-mail at compliance@woli.io

Right to lodge a complaint with the competent data protection authority:

If you consider Woli to process your personal data in an incorrect way, you can contact us at compliance@woli.io. You may also lodge a complaint with the Commissioner for personal data protection in Cyprus or any other competent supervisory authority.

Updates to our Privacy Notice:

We may need to update our Privacy Policy. The latest version of the Privacy Policy is always available in our app and website.

Permission for us to process your Children's personal information

To provide services under Woli Terms and Conditions we need to collect information from you, about your Children for whom you wish for a Woli Account to be created and a Woli Card to be used.

We have a specific Privacy Statement for Children which you should ask them to read and help them understand. It is particularly important for children who are allowed by privacy and data protection laws to give their own consent for their personal data to be processed. This varies between EU countries from children aged 13 or over to children aged 16 or over, inclusive of all ages in between. In some limited circumstances, where allowed by law, we may ask children in these age ranges for some of their personal information and for their consent to our use of it.

By entering into Woli Terms and Conditions, you are giving us permission to gather, process and store your Children's personal information for the purpose of providing our services to you and them.

If you end your agreement to Woli Terms and Conditions, we will stop using your Children 's information for the purpose of providing our services, but we may need to keep their information for other legal reasons.

CREATION OF ACCOUNT, ORDERING AND DELIVERY OF WOLI CARDS AND PROVISION OF SERVICES RELATED TO THE ACCOUNT AND THE WOLI CARD.

Why is your personal data used?

Your personal data will be processed to the extent required for the creation of your Account, the issuance and delivery to you of the Woli Cards that you have requested, the provision of services related to the Woli Cards and Accounts, and the issuance the necessary invoices and other tax related documents for the services provided to you (where applicable).

Your personal data is being used to identify you, to confirm your personal details, to verify that you are at least 18 years old, to confirm your relationship with your child for whom you may request the opening of a Child Account and with your spouse who may register as a Secondary Parent, to verify the age of your child.

What types of personal data are processed?

The following categories of personal data are processed:

- Name, surname, date of birth, nationality, ID or passport details, photo and a video Contact data such as but not limited to your residence address, working address, phone number, email
- Data concerning your family situation and your relationship with your children and spouse, name, surname, date of birth, nationality, ID/passport details, address, e-mail, phone number, of your children that hold an account with us, photo of your child (if this information is shared with us)
- your Woli username & password
- Financial data, such as TIN (if required for the issuance of invoices or other tax related purposes)
- Financial/Transactional data such as how you use our service, transactional data (frequency, amounts, locations, recipients)

Who has access to your personal data?

Access to your personal data have Woli and Paynetics in order to provide the services of the creation of your Account, the issuance and delivery to you of the Woli Cards that you have requested, the provision of services related to the Woli Cards and Accounts, and the issuance the necessary invoices and other tax related documents for the services provided to you.

We may disclose your personal data to third companies which provide to us or Paynetics, ID and address verification services, to entities that provide to us or Paynetics, clearing and other relevant services, to our accountants, auditors and tax advisors and to the competent tax authorities (which act as independent controllers). We may disclose your data to courier companies to the extent required in order to deliver the Paynetics card to you.

What is the legal basis for processing your personal data?

The processing of your personal data is necessary in order for Woli and Paynetics to fulfill their obligations for the provision of e-money related services to you under the agreement that is being

concluded between you and Woli and Paynetics respectively when you ask for the creation of a Woli account. In case you are invoiced by Woli, the processing of your personal data made for the issuance of invoices or other tax related documents is based on our obligation to comply with the applicable tax legislation.

For how long is your data retained?

Your personal data will be retained for as long as you maintain a Woli account and for 5 years after the deletion of your Woli account, unless Paynetics is obliged to keep your personal data for a longer time period in order to comply with the applicable legislation or if there is an open litigation and your personal data is required in order for Paynetics to enforce its rights.

Your personal data required for tax related matters will be kept for 10 years, unless otherwise provided in the applicable legislation.

CREATION OF WOLI ACCOUNT FOR SECONDARY PARENT

THIS SECTION APPLIES ONLY TO SECONDARY PARENTS (AS THE TERM IS DEFINED IN WOLI TERMS AND CONDITIONS)

Why is your personal data used ?

Your personal data will be processed to provide you with viewing rights in the Woli Service according to Woli and Paynetics Terms and Conditions.

Your personal data is being used to identify you and to confirm your relationship with the Parent who is the holder of the Woli Parent Account.

What types of personal data are processed?

The following categories of personal data are processed:

- name, surname, date of birth, nationality, ID or passport details,
- Data concerning your family situation and your relationship with your children and spouse

Who has access to your personal data?

Access to your personal data have Woli and Paynetics in order to provide the services pursuant to this section.

What is the legal basis for processing your personal data?

The processing of your personal data is necessary in order for Woli and Paynetics to fulfill their obligations under the agreement that is being concluded between you and Woli and Paynetics respectively when you ask for your registration as a Secondary Parent.

For how long is your data retained?

Your personal data will be retained for as long as you are a registered Secondary Parent and for 5 years after the termination of the registration, unless Paynetics is obliged to keep your personal data for a longer time period in order to comply with the applicable legislation or if there is an open litigation and your personal data is required in order for Paynetics to enforce its rights.

COMPLIANCE WITH AML OBLIGATIONS

Why is your personal data used?

The services provided to you constitute e-money related services and Woli acts as distributor of Paynetics. The latter is obliged to conduct a series of checks and controls in order to confirm that you are not using their services for the purposes of money laundering or terrorist financing. In this context Paynetics is obliged to verify your identity, your address and information related to your source of income. Woli acting as distributor of Paynetics may also ask you for information or process your personal data for AML purposes. In this case, Woli acts as processor of Paynetics.

What types of personal data are collected?

The following data is collected:

- Name, surname, date of birth, nationality, ID or passport details, photo and a video
- Contact data such as but not limited to your residence address, working address, mobile phone, email
- Data concerning your family situation and your relationship with your children and spouse
- Financial/Transactional data such as how you use our service, transactional data (frequency, amounts, locations, recipients)
- Data concerning your financial situation, tax certificate, data related to your profession and salary/income

Who has access to your personal data?

Your personal data is forwarded to Paynetics which acts as a controller, to collaborating companies which provide to us or Paynetics ID and address verification services as well as services related to AML checks (on PEP, sanctions lists etc). Your personal data may be disclosed to the competent authorities if this is required in order for Paynetics to comply with the applicable legislation (i.e. mainly with obligations regarding reporting of suspicious transactions). Please note that the competent authorities will process your personal data as independent controllers.

What is the legal basis for processing your personal data?

The processing of your personal data for your account is based on Paynetic's obligation to comply with statutory AML legislation.

Which is the retention period of your data?

Your personal data is kept for 5 years following the termination of our relationship, unless the AML legislation provides for a longer retention period.

DIRECT MARKETING**Why do we use your personal data?**

We will process your personal data to send you newsletters and marketing offers, including news regarding our products, promotions, bargains, and other promotional messages via push notifications, and via e-mail and/or phone calls/messages. In order to optimize your experience as a Woli user, we will provide you with relevant information and send you offers.

What types of personal data do we process?

We will process following categories of personal data

- contact information, such as e-mail address and telephone number
- name

Who has access to your personal data?

Your personal data that is forwarded to third parties is only used to provide you with the services mentioned above. As a result, recipients of your personal data may be media agencies and technical suppliers for distribution of promotional messaging. We never pass on, sell or swap your personal data for marketing purposes to third parties.

What is the legal basis for processing your personal data?

The processing of your personal data is based on your consent.

Right to withdraw your consent:

You have the right to withdraw your consent at any time by sending an e-mail to compliance@Woli.io, and the right to object to the use of your personal data for direct marketing purposes. When you do so, Woli won't be able to send you any further direct marketing offers or information based on your consent.

You can opt out from direct marketing by the following means:

- following the instruction in each marketing e-mail
- sending an e-mail to compliance@Woli.io

How long do we save your data?

We will retain your personal data for direct marketing purposes until you withdraw your consent or object to the use of your personal data for direct marketing purposes.

CUSTOMER SERVICE

Why do we use your personal data?

We along with Paynetics will process your personal data to manage queries, to handle complaints, enquiries, and technical support matters.

We may also contact you if there is a problem with your card and/or your account.

What types of personal data do we process?

We along with Paynetics as joint controllers will process any data you provide to us, including the following categories:

- contact information such as name and surname, address, e-mail address and telephone number
- transactions history and information on payments
- all correspondence relating to the matter in question and the personal data contained therein

Who has access to your personal data?

Your personal data is forwarded to third parties, such as technology providers and other cooperating companies, only if necessary in order to handle your requests and/or your complaints. Also, we or Paynetics may share your data with legal advisors if required in order to handle complaints or requests.

What is the legal basis for processing your personal data?

The processing of your personal data is based on the agreement concluded between you and us and/or Paynetics when your request / complaint is related to it.

How long do we keep your personal data?

Your personal data will be retained for five years from the final settlement of the request, enquiry, complaint, query or other matter.

PREVENTION OF MISUSE AND CRIME**Why is your personal data used?**

We and Paynetics will use your personal data to inform the competent official authority, in cases when we detect, misuse of our services and in order to prevent cases of fraud and/or other criminal acts.

What types of personal data are processed?

We as processors of Paynetics will process following categories of personal data as an example

- contact information such as name, address, telephone number and e-mail address
- financial data, data related to your profession and salary/income
- information on the transactions made via WOLI cards

Who has access to your personal data?

Your personal data is forwarded to third parties only for purposes mentioned above.

We or Paynetics will share your personal data with insurance companies, legal authorities and consultants, law enforcement authorities to complete investigations. Some or all of the above recipients may have an independent right or obligation to process your personal data acting in that case as controllers.

What is the legal basis for processing your personal data?

The processing of your personal data to prevent misuse of our services is based on our legitimate interest.

For how long is your personal data retained?

Your data will be retained for the time needed to prevent and/or report potential fraud and other offences.

Cookies policy

We use “cookies” to collect information about you and your activity across our app. A cookie is a small piece of data that our app stores on your computer, and accesses each time you visit, so we can understand how you use our app. This helps us serve you content based on preferences you have specified. Please refer to our Cookie Policy below for more information. For more general information on cookies, please see the Wikipedia article on HTTP Cookies.

Use of Cookies

We use cookies for a variety of reasons detailed below. Unfortunately, in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to our app. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

How we use different types of cookies

Performance cookies are used in the tracking of how you use a website/app during your visit, without collecting personal information about you. Typically, this information is anonymous and aggregated with information tracked across all site users, to help companies understand visitor usage patterns, identify and diagnose problems or errors their users may encounter, and make better strategic decisions in improving their audience’s overall website experience. These cookies may be set by the app you’re visiting (first-party) or by third-party services. We use performance cookies on our app.

Functionality cookies are used in collecting information about your device and any settings you may configure on the app you’re visiting (like language and timezone settings). With this information, websites/apps can provide you with customised, enhanced or optimised content and services. These cookies may be set by the website/app you’re visiting (first-party) or by third-party service. We use functionality cookies on our app, and in specific Google Analytics (Third Party). This app uses Google Analytics which is one of the most widespread and trusted analytics solutions on the web for helping us to understand how you use the app and ways that we can improve your experience. These cookies may track things such as how long you spend on the app so we can continue to produce engaging content. For more information on Google Analytics cookies, see the official Google Analytics page.

Below, you may find a detailed list of the cookies used on our app, their purpose and duration:

Cookie	Purpose	Storage Duration	Category
Google Analytics (_ga)	Collects information about how visitors use our app	2 years	Functionality
Google Analytics (_gat)	Collects information about how visitors use our app	1 min	Functionality

Google Analytics (_gid)	Collects information about how visitors use our app	24 hours	Functionality
-------------------------	---	----------	---------------

Where we send your data.

Our email provider is **Google Cloud EMEA** Limited located at Velasco, Clanwilliam Place, Dublin 2, Ireland, VAT number: IE3668997OH, and it being within the European Union, it is a company compliant to the GDPR prerequisites.

Our newsletter service provider is **Maichimp**, and it is based in 675 Ponce de Leon Ave NE, Suite 5000 Atlanta, GA 30308 USA. It is GDPR compliant, as a company verified under the Privacy Shield Agreement. Any information is sent over SSL / HTTPS to ensure security.

This Policy is effective as of 23th of October 2023.