



PRIVACY STATEMENT FOR ACCEPTANCE PARTNERS & VENDORS

I. General

The data controller within the meaning of Article 4(7) of the GDPR is C2D Payment Solutions Ltd (hereinafter under its registered trademark "Zastrpay"). Zastrpay is committed to the protection of personal data of its Acceptance Partners and Vendors. This privacy statement applies to the processing of personal data of its Acceptance Partners, Vendors, and their employees. This Privacy Statement provides information on how your personal data is collected, processed and retained by Zastrpay, in terms of Articles 12 and 13 of the GDPR.

Personal data refers to data concerning the personal or material circumstances of an identified or identifiable individual. For the purposes of this Privacy Statement, when we refer to your personal data, this includes all personal data, including employee data, shareholder data, data of subcontractors and their employees, or any other data of a personal nature which you transfer to us.

Our data protection practices comply with all applicable data protection legislation, including the provisions of the EU GDPR, and any other European or national legislation we may be subject to.

This Privacy Statement may be subject to modification from time to time, notably in the event of changes to legislation, the introduction of new laws or revision or expansion of our offering. Any changes will be published on our website and notified to you as soon as possible.

II. How Zastrpay processes and retains your data

We shall only collect and use your personal data for the purpose of fulfilling our contractual obligations towards you, or to comply with a legal obligation which we are subject to (e.g. identification obligation), or if we feel we have a legitimate interest to do so that is not detrimental to the right to privacy of the data subject.

Zastrpay processes the following personal data about you and/or your employees:

- All data required for fulfilment of contract between us, including name, surname, details about shop locations, contact details including email address and telephone number;
- All data required for access to our systems and services, including your login details and IP address;
- All data required for Zastrpay to fulfil their due diligence checks, including all necessary supporting documentation as may be required;
- Any other personal data as may be required from time-to-time to fulfil any legal obligations that Zastrpay is subject to, or where we have legitimate interest or consent to do so.

Your personal data will be treated as strictly confidential. We shall only retain your personal data for the length of time necessary for the intended purpose of data collection or for as long as legally required.

III. To whom Zastrpay may transfer your data

Your personal data may be shared with other companies of the group which Zastrpay forms part of. We may also share your personal data with third party service providers with whom Zastrpay has a contractual relationship and who provide services on behalf of, or to Zastrpay. In addition, we may also be required to share your personal data with authorities or other competent bodies as a result of a legal obligation to which we are subject, to detect or prevent fraud, or to safeguard the interests of Zastrpay's personnel.

Where we share your personal data with third parties, we shall take all reasonable precautions to ensure that these third parties respect the same privacy standards as Zastrpay.

We only transfer data to states outside the European Economic Area provided the recipient guarantees a standard of data protection comparable to that in place in Europe.

IV. Due Diligence Checks

Where we are legally obliged to do so or have a legitimate interest, we request Due Diligence documents from you and process them. We also reserve the right to consult due diligence risk information service providers.

In particular, we reserve the right to perform due diligence checks with the aid of, amongst others, the following companies:

- i. Kerberos Compliance-Managementsysteme GmbH, having its registered address at Im Zollhafen 24, 50678 Köln, Germany;
- ii. GB Group plc, having its registered address at The Foundation Herons Way, Chester Business Park, Chester, United Kingdom;
- iii. Refinitiv Limited, Five Canada Square, Canary Wharf, London E14 5AQ, United Kingdom.

The data we receive from you, as well as the third-party providers, will serve as a basis for our decision on whether to establish, conduct or terminate the contractual relationship.

V. Your rights

As a data subject, you have the following rights:

- to request a copy of your personal data;
- to rectify your personal data;
- to request erasure of your personal data;
- to request the restriction of processing of your personal data;
- to object to the processing of your personal data;
- to withdraw your consent at all times (where processing is based on consent);
- to receive your personal data in a structured, commonly used and machine-readable format and/or have it transmitted to another data controller.

All requests, complaints or queries may be addressed to Zastrpay to the email-address mentioned in section VIII. We will consider any requests, complaints or queries and provide you with a reply in a timely manner. You can also file a complaint with the competent Data Protection Authority should you not be satisfied with the way in which we handle your personal data.

VI. Data security

Zastrpay maintains an information security management system in accordance with ISO27001. Technical and organisational measures are used to protect your personal data from unauthorized access by third parties, disclosure, alteration, destruction or loss during its collection, processing, and retention. This level of protection cannot, however, be extended to communication by email and we recommend that you send all confidential data by registered post.

VII. External content and Cookies

We use active JavaScript contents from external providers on our websites. When you access our site, these external providers may receive personal information relating to your visit to our websites. It is possible that this data is processed outside of the EU. You can prevent this by installing a JavaScript blocker such as the browser plugin 'NoScript' (www.noscript.net) or by disabling JavaScript in your browser. However, please note that if you do so, you may not be able to use the full functionality of the websites you visit. Please also note that Zastrpay cannot accept any responsibility for external content.

We also use cookies on our websites, in our applications and in our newsletters to make them more attractive to users, to enable the use of certain functions, to improve our website, applications and newsletters or to perform certain statistical analysis. So-called 'cookies' are small text files which your browser can place on your computer or mobile device and which may contain certain (personal) information (e.g. IP address, your operating system/terminal settings, website from which file was accessed, name of file, date and time of retrieval, volume of data transmitted, notification of whether data retrieval was successful (so-called web log)). The process of placing a cookie file is

also known as 'setting a cookie'.

You can modify your browser settings to notify you when a cookie is set, to accept them on a case-by-case basis, or to accept or reject the use of certain cookies. We recommend that you accept the cookies that we set on our websites, applications and newsletters to get the best out of their functions.

1. The following types of cookies may be used by us on the website:
 - a) Essential cookies: These cookies are essential to make the website work correctly. These cookies don't collect personal information.
 - b) Functionality and Performance cookies: Performance cookies monitor behaviour on our websites and applications, which allows us to improve their performance. These cookies don't collect personal information, but only data that are anonymised or aggregate. Functionality cookies enable previous choices of users to be remembered (e.g. username, language). They help improve the user's experience and allow your experience to be personalised. The information these cookies collect may include personal information. If you do not accept these cookies, it may affect the functionality and may restrict access to content on the website.
2. First Party Cookies are cookies set on your device by Zastrpay directly to allow us to deliver our services to you. All of the first party cookies are essential cookies, and are generally used for the following purposes:
 - a) To determine where the website traffic originated from (including any platform and/or websites);
 - b) For the general functionality of our website, particularly to ensure that all our website features work correctly (including, amongst others, language preferences, consent preferences, etc);
 - c) To measure our website's performance;
 - d) For general testing purposes (also to ensure performance and functionality of the website);
 - e) Any other purposes as may be necessary and deemed essential from time-to-time.
3. Third Party Cookies are cookies set on your device by third party service providers to allow them to deliver their services to you. The setting of these cookies is regulated by the cookie policies of the respective third parties. Currently, we use the following plugins and active script contents from third-party providers on this website. Zastrpay reserves the right to use additional plugins and script contents at any time:

- a) Google-Analytics: This website uses Google Analytics, a web analytics service provided by Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter referred to as Google). Google Analytics uses various techniques, including so-called 'cookies', which are text files placed on your computer to help the website analyse how users use the site. The information obtained by Google Analytics about your use of the website will be transmitted to and stored by Google on servers which may be operated outside member states of the European Union as well outside states party to the Agreement on the European Economic Area. In case of activation of IP anonymisation within the Google Analytics tracking code for this website, Google will anonymise your IP address before transmission. This website uses a Google Analytics tracking code, to which the operator "gat_anonymizeIp();" is added to enable anonymised collection of IP addresses (so-called IP masking). Google will use this information on behalf of the website operator for the purpose of evaluating your use of the website, compiling

reports on website activity and for providing other services relating to website activity and internet usage to the website operator. Google Analytics will not associate your IP address with any other data held by Google. You may refuse the use of Google cookies by selecting the appropriate settings on your browser. However, please note that if you do so, you may not be able to use the full functionality of this website. You can prevent Google's collection and use of data relating to your use of the website (incl. your IP address) by downloading and installing the browser plug-in available at <https://tools.google.com/dlpage/gaoptout/>. Further information concerning the terms and conditions of use and data privacy can be found at <http://www.google.com/analytics/learn/privacy.html>.

- b) Microsoft Clarity: We partner with Microsoft Clarity and Microsoft Advertising to capture how you use and interact with our website through behavioral metrics, heatmaps, and session replay to improve and market our products/services. Website usage data is captured using first and third-party cookies and other tracking technologies to determine the popularity of products/services and online activity. Additionally, we use this information for site optimization, fraud/security purposes, and advertising. For more information about how Microsoft collects and uses your data, visit <https://privacy.microsoft.com/privacystatement>.

VIII. Contact for matters of data protection

For any privacy issues you may have or to obtain further data on our data processing activities, please contact our Data Protection Officer at:

C2D Payment Solutions Ltd
6th Floor, Portomaso Business Tower
STJ 4011, St. Julian's, Malta
Email: dpo@zastrpay.com

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