

IMPORTANT INFORMATION AND WHO WE ARE

Synaps SAS ("Synaps.io", "we", "our", or "us") respects your privacy and is committed to protecting your personal data. This privacy policy will inform you about how we treat your personal data when you use our platforms and services (collectively referred to as "Services") and when you use our website. This policy does not apply to third-party websites, products or services.

This privacy policy is issued on behalf of the Synaps SAS so when we use the terms "Synaps.io", "we", "us" or "our" in this privacy policy, we are referring to the relevant company Synaps SAS responsible for processing your data.

Synaps.io is committed to adequately protecting your personal data regardless of where it is processed and regardless of your location.

Synaps.io is the controller of personal information collected and processed for the Services, unless stated otherwise.

OUR DATA PROTECTION OFFICER

Synaps.io appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below. Synaps.io's DPO can be reached in English or French. We try to acknowledge receipt of your request within 3 business days and respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Email address: privacy@synaps.io

Postal Address:

4 Rue de la République

69001 - Lyon

France

WHAT PERSONAL DATA DO WE COLLECT?

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data from which the identity of the individual cannot be discerned (anonymous data).

We use different methods to collect data from and about you. Data is collected through the following:

OUR WEBSITE

When you use our website, we may collect, use, store and transfer the following data:

- Information you give us while using our website. We may ask you to provide us with personally identifiable information while you use our website. This includes your full name, e-mail address and your phone number.
- Automated technologies or interactions. We may use cookies, server logs and other technologies, such as web beacons, to collect information that your browser sends us when you are using our website. This includes your computer's internet protocol, browser type, browser version, the country from which you visited our website, how you arrived at our website, length of your visit and which pages you

viewed. Please refer to our cookie policy for further information about how we use cookies and similar technologies.

OUR SERVICES

When you use our Services, we may collect, use, store and transfer the following personal data:

- Information you give us. We may collect personal data directly from you, as set out below:
 - Personal data collected from your Verify system session user. We will ask you to provide us with personal data when you register to the Verify system. If you register to our Verify system, we will collect, store and process personal data, such as your full name, e-mail address, and information available in your proof of identity.
 - If you are a customer applying to use our Services, we will collect, store and process personal data relating to you and other individuals associated with you, such as full name, email address, date of birth, place of birth, nationality, home address, proof of address, photocopy of a personal identification card or passport and other information as required to on-board you and meet applicable legal requirements.
- Information provided by third parties. We may collect personal data about you from third parties, as set out below:
 - When required for compliance with applicable laws (including specifically anti-money laundering and counter-terrorism financing laws and regulations), we may verify your information and collect information from publicly available sources, fraud prevention agencies or check data against government sanction lists, either directly, or using identity verification providers or due diligence and screening information providers.
 - When securing our website and Services, we may collect details about your device, your computer's internet protocol and other technical information, through our data security and firewall providers.
 - When marketing our Services, we may collect identity and contact data from publicly available sources.

HOW DO WE USE YOUR PERSONAL DATA?

We will process your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you as our customer.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, such as mitigating financial loss or other harm to our merchants, you and us.
- Where we need to comply with legal or regulatory obligations, such as detecting and preventing anti-money laundering and counter-terrorism financing.
- Where we need to improve and analyze our products, website, systems and tools.

Examples of how we may process your personal data include:

- To manage risk and protect the website, the Services and you from fraud/forgery, abuse and other illegitimate activities, by monitoring, detecting and preventing such activities.
- To comply with our obligations and to enforce the terms of our website and Services, including to comply with all applicable laws and regulations.
- Monitor illegitimate activities and prevent information security risks related to our website and Services.
- Evaluate your application to use our Services and verify your identity for compliance purposes.

- Respond to inquiries, send service notices and provide customer support.
- For audits, regulatory purposes, and compliance with industry standards.
- Notify you about changes to the nature or terms of our Service.
- To administer our website, including troubleshooting, data analysis, testing, research, statistical and survey purposes.
- To improve our website to ensure that content is presented in the most effective manner.
- Authenticate your access to your account.
- To improve or modify our Services.
- To develop new products.
- To send marketing communications.
- For our legitimate interests, including to:
 - enforce the terms of our website and Services;
 - manage our everyday business needs, such as monitoring and analyzing; and
 - anonymise personal data in order to provide aggregated statistical data to third parties, for example to our clients.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out a description of the purposes we plan to use your personal data and the lawful basis for our processing activities below:

Purpose Activity	Type of data	Legal basis for processing including basis of legitimate interest
To facilitate and enable our relationship with you as a prospective, new or existing customer	Identity and contact details	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (for running our business and to prevent fraud/forgery)
To manage our relationship with you as a user of our website or Services, which will include: <ul style="list-style-type: none"> • Notifying you about changes to our Service, terms or privacy policy • Provide Services to you 	Identity and contact details	<ul style="list-style-type: none"> • Performance of a contract with you • Necessary to comply with a legal obligation • Necessary for our legitimate interests (to keep our records updated and to study how customers use our products and services)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	Technical, device and usage details	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	Identity, contacts and technical details	Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud Necessary to comply with a legal obligation)

NOTICE TO OUR CUSTOMERS

We may collect, use and disclose certain personal data about your customers when acting as your service provider. You are responsible for making sure that your customer's privacy rights are respected, including ensuring appropriate disclosures about third party data collection and use. You must comply with the personal data protection laws of your country of origin and of those countries in which you offer products or services and, in particular when processing and sending personal data to us in the context of using the Services.

DISCLOSURES OF YOUR PERSONAL DATA

We share your personal data with trusted third parties for the purpose of providing our Services and promoting our business, as follows:

- Personal data necessary to facilitate your identification; and
- Personal data to help our partners resolve identification and detect and prevent fraud; and
- Personal data and performance analytics to help our merchants better understand the uses of their platform and to help our merchants enhance their customers' experiences.

Third-party service providers. We may also use third-party service providers acting on our behalf. These service providers help us with data and cloud services, website hosting, data analysis, application services, advertising networks, information technology and related infrastructure, customer service, communications and auditing.

Safety, Legal Purposes and Law Enforcement. We may share your personal data with third parties to detect, prevent or otherwise address fraud, security or technical issues, or to protect against harm to the rights, property or safety of Synaps.io, our users, customers, employees or the public or as otherwise required by law. We also use and disclose your personal data as we believe necessary (i) under applicable law; (ii) to enforce our terms and conditions; (iii) to protect our rights, privacy safety or property, you or others; and (iv) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.

All our third-party service providers are required to process the data in accordance with applicable data protection regulations and to take appropriate security measures to protect your personal information in line with EU data protection standards and our policies.

We do not allow our third-party service providers to use your personal data for their own purposes.

In addition, when a third-party entity processes your personal data on our behalf and according to our instructions, we sign a written agreement with it that specifically describes its obligations with regard to security and data protection, in accordance with European data protection laws. We only permit them to process your personal data for specified purposes.

TRANSFER OF DATA OUTSIDE THE EUROPEAN ECONOMIC AREA (EEA)

When possible, the data we collect from you is stored and processed at data centres in the EEA.

Synaps.io will take all reasonable legal, technical, and organisational measures to ensure that if your data is transferred outside of the EEA, it will be treated securely and with an adequate level of protection compared to the level of protection offered within the EEA.

We have taken specific steps, in accordance with European data protection law, to protect your personal data. In particular, we will strive to restrict the transfer of your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

Transfers of personal data outside of the European will take place only where the organisation receiving the personal data has provided us with adequate safeguards, and subject to a written agreement, in line with the requirements of European data protection law applicable to processors and data transfers.

DATA SECURITY

Protecting your information and your privacy is extremely important to us. Being entrusted with some of your most valuable data, we have set high standards for data security. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed, altered or disclosed in an unauthorized manner.

In addition, we limit access to your personal information to those employees and third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

RETENTION OF YOUR INFORMATION

We retain your personal data in an identifiable format for the least amount of time necessary to fulfil our legal or regulatory obligations and for our business purposes. We may retain your personal data for a longer period when there is a specific legal requirement to do so, for example in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Data are retained for the following periods of time:

Type of data	Purpose pursued	Period of retention
Identity and contact details of customer	Performing a contract, providing services and notifying changes to our terms or privacy policy Review of new merchants	5 years after termination of the contract, or from the last contact, as applicable

Technical, device and usage details (data analytics)	Improving our website, products/services, marketing, customer relationships and experiences	Prospects: Three (3) years from the data collection or from the last contact of the prospect. Clients: Five (5) years after termination of the Agreement Data collected through cookies: see our cookie policy
Identity, contacts and technical details	Administering and protecting our business and this website	Clients: Five (5) years after termination of the Agreement Data collected through cookies: see our cookie policy
Final customer identity	Complying with anti-money laundering and regulatory requirements	Five (5) years from date of transaction or the end of the business relationship

If your account is closed, we reserve our right to retain and access your personal data for so long as required to comply with applicable laws. We will continue to use and disclose your personal data in accordance with this privacy policy.

The cookies we use have defined expiration times; unless you visit our website within that time, the cookies are automatically disabled and retained data is deleted. Please consult our cookie policy for more information.

In some circumstances you can ask us to delete your data: see below for further information about your rights.

In some circumstances we may anonymise your personal data for statistical purposes in which case we may use this information indefinitely without further notice to you.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

YOUR RIGHTS

Under certain circumstances, you have rights under data protection laws in relation to your personal data:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove your personal data. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please be aware that we may have to keep some of your data to comply with the law but we will evaluate your request within applicable data protection laws.
- Object to processing of your personal data. In certain circumstances you can object to our processing of your personal data. You have the absolute right to object where we are processing your personal data for direct marketing purposes. You can exercise this right at any time by contacting us.
- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if

you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data and we are considering whether we have overriding legitimate grounds to use it.

- Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine- readable format. This right applies to information which you have provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. Please note that if you withdraw your consent, we may not be able to provide certain products or services to you.
- You have the right to object to automated individual decision-making and profiling, and the right to request human intervention where we have relied on automated decision making or profiling.

If you wish to exercise any of the rights set out above, please contact privacy@synaps.io or use the postal address mentioned at the beginning of this privacy policy. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

COUNTRY-SPECIFIC NOTICES

Notice relating to our operations in the European Union

Where you are such an individual:

When processing personal data of data subjects who are in the European Union (EU) or in connection with Synaps.io's Services, Synaps.io will act either as data controller or data processor. When Synaps SAS determine the purpose and the manner of processing of your personal data, Synaps.io is deemed to be a data controller.

- Synaps SAS is registered in France under Company Number 882019110, with its registered address at 4 Rue de la République, 69001 - Lyon, France.
- Instruction on the processing of your Personal Data after your death. For data subjects in France or if your data is processed by Synaps SAS, you have the right to issue general or specific instructions regarding the fate of your Personal Data after your death, in accordance with the terms of Article 85 of French Law No. 78-17.
- You have the possibility to contact the French Data Protection Authority (CNIL) if you consider that your rights relating to the protection of your personal data are not respected. The CNIL's contact details are available at the following address: <https://www.cnil.fr/>.

CHANGES TO THIS PRIVACY POLICY

We will regularly review and update this policy. Any changes we make will be posted on this page and, where appropriate, notified to you by email. Please check back frequently to see any updates or changes to our privacy policy.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.