# **Privacy Policy**

## 1. General Information

- 1.1. This web-service hosted under domain <a href="https://www.payjoker.com">https://www.payjoker.com</a> belongs to Boomer Sky Ltd. At Boomer Sky Ltd., 239 High Street Kensington, London, W8 6SN, United Kingdom, England, ("BoomerSky", "our", "us" or "we"), we regard the fair and lawful treatment of personal information as a critical factor in the success of our operations and a key to the maintenance of the confidence that exists between those with whom we deal and ourselves. We, therefore, acknowledge our legal obligations under the General data protection regulation (GDPR) and endorse its requirements.
- 1.2. We understand that you are aware of and care about your personal privacy interests, and we take that seriously. "You" in this policy means the private individual who is using or otherwise requesting to use the products and services offered by us either on his/her own account or on behalf of a legal entity. This Privacy policy defines our approach regarding the collection and use of your personal data, and sets forth your privacy rights.
- 1.3. From time to time, we may develop new or offer additional services, so we may update this Privacy policy accordingly. We recommend that you download or print a copy of this Privacy policy and store it for your records and future reference.

### 2. Data collection

- 2.1. In accordance with the applicable laws and regulations, we only collect and process a limited amount of data, including personal information, about you that is necessary to perform our business operations and provide you with our products and services. Personal information as used in the context of this Privacy policy, applies to any information that identifies or that can be used to identify you as a private individual, such as your name, mobile phone number, email address, date of birth, and possible further information for the purpose of responding to your request or delivering a specific product or service.
- 2.2. We may also require other identification information if you send or receive certain high-value transactions or high overall payment volumes through our services or as is otherwise required in order for us to comply with our anti-money laundering and counter-terrorism financing obligations under the respectively applicable laws.
- 2.3. We therefore collect three types of data:
  - 2.3.1. Information that you voluntarily provide
    - information that you provide by filling in forms on our website, which includes information provided at the time of registering to use our website and reporting a problem;
    - information provided via electronic means of communication, i.e. when you contact us, we may keep a record of our correspondence;
    - information regarding an enquiry from you about our products or services;
    - information that you provide in the context of your job application.
  - 2.3.2. Information received from third parties
    - information received by one of BoomerSky group members;
    - information received by the card associations, credit reference agencies, fraud prevention agencies, government and law enforcement agencies;
    - information received via public sources like company registers and filings.
  - 2.3.3. Information collected from your computer or your electronic device by our website As with most websites, the following non-personal data is routinely collected during visits to our website and use of our online resources. This information may include the name of your internet service provider (IP address), the website that directed you to our website, browser and/or device type, date, time and length of your visit. This information cannot be used to personally identify visitors. When collecting and processing your IP address, the latter will be fully anonymised right after collection by deleting the last three figures. That way we are no longer able to identify you as a person.
    - Information collected through the use of cookies
      - Our website uses cookies. We do not use cookies to collect information about your browsing habits in order to make advertising relevant to you and your interests (so called "targeting cookies" or "advertising cookies"). However, you can, at all times, manage website cookies in your browser settingsand change these settings by accepting, rejecting, or deleting cookies. For more information, please visit our <u>Cookie Policy</u>

## 3. Use of personal information

- 3.1. We collect, store and process your personal information as described hereunder, primarily to provide you with safe, smooth, efficient, and customised experience, and specifically, for the following business-related purposes:
  - 3.1.1. Provision of products and services. To ensure our customers are genuine and that we are paid for the products and services we provide, we use your personal information for identification and verification purposes, i.e. to confirm your identity and conduct appropriate due diligence checks.
  - 3.1.2. Contractual obligations. We need your personal information in order to carry out our obligations arising from any contracts entered into between you and us.
  - 3.1.3. Email alerts. Where you have explicitly consented, we use your personal data to provide you with information about our products and services, to inform you about important changes to this Privacy policy or other relevant business news.
  - 3.1.4. Job applications. If you wish to apply for an advertised vacancy, we need your personal information in order to administer the recruitment process.
  - 3.1.5. Legal obligations. We may be required to collect and retain personal information about you for legal and compliance reasons, i.e. to manage risk, or to detect, prevent, and/or remediate fraud or other potentially illegal or prohibited activities.
  - 3.2. Consistent with our commitment to protect your personal data, we only conduct such processing where a valid lawful basis exists. In particular, we use your personal data in line with our contractual and/or legal obligation,

or when we have a legitimate interest. Where our reason for processing is based on your consent, you may withdraw that consent at any time.

## 4. Security of personal information

- 4.1. We are committed to make sure your information is protected. Once we receive your information, we use various security features and strict procedures, considering industry standards, to ensure the privacy and confidentiality of data and personally identifiable information.
- 4.2. We authorise access to your personal data only for those employees who require it to fulfil their job responsibilities and provide benefits, goods or services to you. We educate our employees about the importance of confidentiality and maintaining the privacy and security of personal data.
- 4.3. Our security procedures are constantly revised based on new technological developments in order to ensure the highest level of protection of your personal information.

### 5. Data storage and retention

- 5.1. We take appropriate technical and organisational measures, both at the time of the design of the processing system and at the time of the processing itself, in order to maintain security and prevent unauthorised processing.
- 5.2. Your personal information will be retained by our company for as long as is necessary for the specific purpose or purposes for which it was collected, unless a longer retention period is required or permitted by law. When we no longer need personal information, we securely delete or destroy it.

#### 6. Disclosure of information to third parties

- 6.1. In order to provide our services, some of the information we collect may be required to be disclosed to our subsidiaries or other entities within our organisation. As an Agent of many different payment service providers, we work with numerous third parties in order to perform our operations in the most efficient way. We may therefore disclose personal information to those entities in order to respond to your requests or inquiries, or when necessary to fulfil the services they provide to us such as software, system, and platform support, cloud hosting services, etc.
- 6.2. We may also share personal information when we are required to comply with legal obligations and respond to requests from government agencies. This includes exchanging data with other organisations for the purpose of fraud prevention and anti-money laundering measures.
- 6.3. We may share your personal information if we believe it's reasonably necessary to protect the rights, property and safety of our company or its customers.
- 6.4. We do not collect or compile personal information for dissemination, rent or sale to external parties for their marketing purposes without your explicit consent.

#### 7. Links to other websites

- 7.1. Please be aware that this Privacy policy does not cover the privacy policies of other websites, even if you accessed them using links within our website. Whilst we try to link only to websites that share our high standards and respect for privacy, we are not responsible for the security and privacy of any information collected by these third parties.
- 7.2. We recommend that you check the Privacy policy of each third-party website that you visit to determine their use of your personal data.

#### 8. Cross border transfers of data

8.1. We are committed to adequately protecting your personal information regardless of where it resides and to providing appropriate safeguards for your data where the latter is transferred to recipients located outside of the EEA.

#### 9. Rights of data subjects

- 9.1. Whenever we process your personal data, we take reasonable steps to ensure that it is kept accurate and up to date for the purposes for which it was collected. With respect to the information related to you that ends up in our possession, and recognising that it is your choice to provide it to us, we commit to giving you the ability to do all of the following:
  - 9.1.1. Right to be informed. You have the right to be informed about the processing (collection and use) of your personal data.
  - 9.1.2. Right to access. You have the right to obtain confirmation whether or not we are processing personal data about you. You may also request information about: the purpose of the processing; the categories of personal data concerned; who else within our group might have received the data; and how long it will be stored.
  - 9.1.3. Right to correction. You have the right to review and amend the record of personal data maintained by us if you believe it may be out of date or inaccurate.
  - 9.1.4. Right to restrict processing. You have the right to restrict the processing of your personal data, e.g. to limit the way that we use your data.
  - 9.1.5. Right to portability. When technically feasible, we will, upon request, provide your personal data to you or transmit it directly to another data controller.
  - 9.1.6. Right to opt-out. You can opt-out of receiving electronic marketing materials from us at any time. This can be done through your account settings, by clicking the "unsubscribe" link in any email communications which we might send to you, or by contacting our DPO. Please note that this might take a few days.
  - 9.1.7. Right to withdraw consent. You are entitled to withdraw your consent to the processing of your data.
  - 9.1.8. Right to complaint. You have the right to lodge a complaint with the appropriate supervisory authority if you have concerns about how we processes your personal data.
- 9.2. Reasonable access to your personal data will be provided at no cost within a month upon receiving your request to office@boomersky.com. If access cannot be provided within the aforementioned time frame, we will provide you with the exact date when the information will be provided.

- 9.3. We reserve the right to charge you a GBP 10.00 fee for administrative costs if your requests are manifestly unfounded or excessive, in particular because of their repetitive character. In accordance with our security procedures we may occasionally request proof of identity before we disclose personal information to you.
- 9.4. Please bear in mind that there may be legal or other reasons why we cannot, or are not obliged to, fulfil a request to exercise your rights. We will confirm what they are if that is the case.
- 9.5. We understand that you may have questions or requests regarding this Privacy policy or your personal information. Feel free to address them to office@boomersky.com.

#### 10. Modifications

- 10.1. We will only use your personal information in the manner described in this Privacy policy effective at the time the information was collected. However, we keep this Privacy policy under regular review and in case of any revisions, the latter will be promptly communicated on this page.
- 10.2. We encourage you to periodically review this page to be informed about any changes in how we are protecting your personal data. This Privacy policy was last updated on March 27th, 2019.