

Tap - Website & App Privacy Policy

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PLEASE SEE OUR [PRIVACY SNAPSHOT](#) BELOW FOR AN OVERVIEW OF OUR PRIVACY PRACTICES.

IMPORTANT INFORMATION:

This is the Privacy Policy that governs how we use personal data that we collect, receive and store about Customers in connection with the use of:

- The website/portal features and services provided to you when you visit our websites or portals or apps.
- When you apply to use and/or use our service.
- Your use of software including mobile and desktop applications provided by Tap; and
- Email, other electronic messages including SMS, telephone, website/portal and other communications between you and Tap.

Together these are all referred to in this policy as "Services".

Tap Americas LLC ("Tap") is the company that provides the technology of the tap product. Tap is a limited liability company organized under the laws of the State of Florida, with office at 2875 S. Orange Ave., Ste. 500, #6109, Orlando, FL 32806.

Please see our US Consumer Privacy Notice for more information about how we handle personal data that is governed by US financial privacy law.

INTRODUCTION

This Privacy Policy explains our data practices and the choices you can make about the way your personal data is collected and used in connection with our Services. In this Privacy Policy, personal information or personal data means any information or data that relates to or may be used, either alone or in combination with other data, to personally identify an individual, including a person's name, personal profile, e-mail address, physical address or other contact information.

We strongly urge you to read this Privacy Policy carefully to understand our policies and practices regarding your personal data and how we will treat it. If you do not agree to this Privacy Policy, please discontinue and avoid using our Services.

By visiting www.withtap.com ("Website") and/or using our Services, you are accepting and consenting to the practices described in this Privacy Policy as may be updated from time to time.

WHAT INFORMATION DO WE COLLECT?

We receive and collect personal information from you when you provide us your name, e-mail address and other information requested during signup. You may also provide us with personal information when we communicate using email or another communications mediums like telephones.

We receive and collect personal information from your browser about your use of the Services. We use "cookies", technical identifiers and other tracking technologies in order to provide and enhance our Services (please see our separate cookies policy).

We receive and collect personal information from other sources, such as, merchants, business partners, acquirers, payment service providers, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers and fraud prevention agencies.

We collect the following information:

Information you give us: We receive and store any information including personal and financial information you provide to us including when you (or your business): enquire of or make an application for our Services; register to use and/or use any our Services; upload and/or store information with us using our Services; and when you communicate with us through email, SMS, a website or portal, telephone or other electronic means. Such information may include you or your customer's:

- Company and business professional contact information, including name, address, phone number, fax number, e-mail address, domain names, and trade associations.
- Background information regarding company management, such as beneficial ownership/persons of significant control - including first name and family name, date of birth, email address, billing address, username, password, address, nationality and country of residence.
- Detailed company profiles.
- Company operational histories, including territories, subsidiaries, affiliates, and lines of business. Detailed trade and business credit information, including payment histories.
- Business information regarding profitability.

- Information about your friends/family/contacts for social, in-app and referral interactions.
- Any other information that you or your customer provide.

Information we collect about you: We receive and store certain information whenever you interact with us; for example, by way of "cookies" or similar technology. We also obtain certain information when your web browser or mobile APP accesses our Services and other content provided by or on behalf of us on other web sites, or when clicking on emails including:

- The Internet protocol (IP) address used to connect your computer or device to the Internet, your login information, browser type and version, browser plug-in types and versions, operating system platform.
- Information on your location during signup and active user sessions for fraud prevention.

Please also refer to our Cookies Policy, for more information and see the separate Cookies section of this policy, below:

Email and Other Communications: We may receive information about you and your use of our Services when we communicate with each other, including when you open email, messages from us and from the use of electronic identifiers (sometimes known as 'device fingerprints'), for example, Internet Protocol addresses or telephone numbers.

Tap does not seek to collect any information in relation to a customer's race or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation, genetic or biometric data.

TAP AND SOCIAL INTERACTIONS

Tap may use your personal information to enable social interactions through our services and to provide additional functions in order to deliver a better experience.

The types of information we use are:

- Information you have provided.
- Information from your device (Contacts/Phonebook) Geo-locational information.

HOW WE WILL USE YOUR INFORMATION

Your information (as above) will include information about you (and / or your business) and customers. If you give us information, including sensitive personal data, about yourself or other people, you agree (and confirm that the person the information is about has agreed) that we can use this information in the way set out in this policy.

We may use and share your information with our subsidiaries or affiliated companies, business partners, financial institutions, employees, professional advisors, sub-contractors, fraud prevention agencies and third-party service providers to help us and them:

- To provide our Services to you and your business including fulfilling our obligations to you or to financial or other institutions in connection with the Services we provide to you (and / or your business).
- To improve and develop our business, including without limitation to optimize our websites/portals, products and services.
- To provide you with the information, products and services you have requested, or we think may be of interest to you.
- To manage and enforce our rights, terms of use or any other contracts with you (and/or your business) for the provision of our Services.
- To identify and authenticate your access to non-public parts of our Services.
- To send you service and administrative e-mails and messages, including to inform you about important changes or developments in our Services, to provide you with important Services related notices, such as security notices, to notify about your transaction and to respond to a "Contact Us" or administrative request (for example, to change your password). These e-mails and messages are considered an integral part of the Service and you may not opt-out of them.
- To send you information we believe you would find interesting including marketing and promotional materials; by post, email, telephone, SMS text or other means, including electronic means. You can object to marketing at any time, as explained below.
- For interest-based advertising. We engage our advertising partners, including third party advertising and social media companies, for interest-based advertising purposes. We may use cookies and similar technologies to collect information (including the automatically-collected data (such as IP address) described above) about your interactions over time across our Services, our communications, and other online services, and use that information to serve online ads that we think will interest you.
- To identify and monitor for fraud, we and other organizations may access and use information recorded by fraud-prevention agencies. To assist in the course of any investigation by us, other financial organizations or other third parties into any suspected criminal activity. To obtain your views on our services and our website.
- To develop and test services.
- To let you know within the app if any of your contacts/friends are a registered Tap user. If you have the relevant settings in

the Tap App activated, we'll use the contact list on your phone so you can easily make payments to your contacts. We will never store any of this data on Tap's servers.

- To comply with local and national laws, including card scheme rules and requests from law enforcement and regulatory authorities; and
- In respect of marketing, market research and similar activities, we may use your personal data for such purposes whether or not you are accepted as or continue to receive Services. If you sign up to receive this information and then no longer wish to receive the marketing or promotional information from us, please let us know via the Contact Us section within your APP or via the address shown on <https://www.withtap.com>.

WHO DO WE SHARE THIS INFORMATION WITH?

We may share or receive information about you with or from other sources and add it to our account information, including when you use any of the other websites we operate or other services we provide. We are working closely with third parties including:

- Banking and business partners and Sub-contractors for the performance of any contract we enter into with them or you, or any services that we provide to you.
- Acquirers and Payment Service Providers (where allowed under any Terms of Use or other contract): including the credit institution where you (or your business) maintains its bank account and the card schemes governing the issue and use of credit, debit, charge, purchase or other payment cards, alternative payment schemes and any other financial institutions who may process payments and who are not operating under Tap control nor for whom whose actions or omissions Tap has liability.
- Outsource and Service providers - such as credit card processors, e-KYC solutions providers, auditors, advisors, consultants, live help/chat providers and contractors Tap's websites and business operations and we may receive information about you from them or provide such information to them. We contractually require these recipients to only use personal data for the intended purpose of the disclosure and that they destroy or return it when it is no longer needed.
- Third-party marketing and advertising partners, including for the interest-based advertising purposes described above.
- As required or appropriate in order to protect our website, business operations or legal rights, or in connection with a sale.

We may disclose also your personal information to third parties:

Where we are required or permitted to do so by law: we may be required by law to pass information about you to regulatory authorities and law enforcement bodies worldwide, or we may otherwise determine that it is appropriate or necessary to do so. Such disclosures may also include requests from governmental or public authorities, or with commercial organizations with whom you may have had dealings and whom are seeking to mitigate fraud risk, or for the purposes of litigation or legal process, national security or where we deem it in the national or public interest or otherwise lawful to do so.

Business transfers: Tap may buy or sell business units or affiliates. In such circumstances, we may transfer customer information as a business asset. Without limiting the foregoing, if our business enters into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners; and

With your permission: Your information may also be used for other purposes for which you give your specific permission, or when required by law or where permitted under the terms of the relevant data protection legislation.

DATA RETENTION

Personal data is stored for varying lengths depending on the nature and purpose for which it was collected. We store personal data in line with any applicable statutory minimum periods, and then review it periodically (usually annually) to ensure it is still necessary to be retained for the purpose for which it was collected.

The data that you provide us is sent via a secure link (HTTPS) and sensitive data stored is encrypted using standard encryption technology in computer servers with limited access and in controlled facilities. We follow generally accepted industry standards to protect personal data, however no method of transmission over the Internet or method of electronic storage is 100% secure.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of the Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. We will never contact you and ask for your password.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Website or/and the Services; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

All our employees and data processors, who have access to, and are associated with the processing of personal data, are obliged to respect the confidentiality of your personal data. The Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

DATA SUBJECT RIGHTS

Subject to certain exemptions and depending on your jurisdiction, you may have rights with respect to your personal data.

You may have the right to request from us confirmation of whether and how we are processing your personal data, and if so, access to that information. Where applicable, we will provide the information in a portable, machine-readable, and readily-usable format.

If any of your personal data is inaccurate, you may have a right to request correction. We are very keen to ensure the data we hold is accurate and up to date. Please contact Customer Services via support@tap.global.

You may have the right to request that we delete your data, although please note that this may mean we are unable to continue to provide you with the Services.

You may have the right to opt out of the sale of your personal data or the use of your personal data with third parties for targeted advertising purposes. You can exercise this right by visiting the "Do Not Sell or Share My Personal Information" link in the footer of our website.

We will always observe your objection to receiving either our Tap marketing or to us passing on your contact details to third parties for their direct marketing purposes: please contact Customer Services including the name, business name, address, telephone number and email address that you wish to have excluded.

You are entitled to exercise the rights described above free from discrimination.

California residents can empower an "authorized agent" to submit requests on their behalf. We will require authorized agents to confirm their identity and authority, in accordance with applicable laws. Before we are able to provide you with any information or correct any inaccuracies, we may ask you to verify your identity and to provide other details to help us identify you and respond to your request. In some instances, your choices may be limited, such as where fulfilling your request would impair the rights of others, our ability to provide a service you have requested, or our ability to comply with our legal obligations and enforce our legal rights.

You can exercise your rights by contacting us at:

- support@tap.global

Opting Out of Marketing Communications: If you have opted to receive marketing-related messages from us and would prefer to no longer receive these, or if you would prefer that we not share personal data about you with any of our business partners, you may later opt-out of receiving messages from us or from our future sharing of information about you by following the "unsubscribe" instructions in the latest such message you have received. We will endeavour to comply with your request as soon as reasonably practicable. Please keep in mind that if you opt-out of receiving promotional messages from this Website, we will continue to send you transactional messages and important account-related information regarding this Website or Services offered through this Website.

HANDLING OUR CUSTOMERS' DATA

Sometimes our customers provide us with their business data, such as their customer, supplier or prospect data - which may contain personal data - in order for us to provide them a service. In these instances, we are the processor or service provider of any personal data contained in their data. Different parts of applicable data protection law apply when we act as a processor and we take these obligations very seriously. The above notice does not apply to our data received from our customers as this does not become Tap data (unless the customer has expressly agreed to this).

UPDATING THIS PRIVACY NOTICE

We strive for continuous improvement in our services, processes and protecting data subject rights. We will therefore update this privacy notice from time to time. Therefore, we advise you to check this notice on a regular basis, or if requested we will send it to you on a regular basis.

CONTACT US

If you have any comments or questions regarding our Privacy Policy or if you have any concerns regarding your Privacy, you can contact our support team at support@tap.global.

COMPLAINTS

All complaints or concerns and appropriate resolution relating to the practices of handling personal information will be logged. Any complaints of this nature should be made to Customer Services at: support@tap.global.

You also have the right to lodge a complaint with a supervisory authority.

PRIVACY SNAPSHOT

The chart below provides a high-level snapshot of our privacy practices. You need to read the entire Privacy Policy for complete information.

Category	Collected	How We Collect	Primary Purposes of Processing	Key Recipients / Disclosures	Can You Limit Sharing?
Identifiers such as a real name, alias, postal address, unique personal	Yes	When you visit or use our Services; when we communicate with you;	To provide our Services; improve, monitor, and personalize our Services; communicate with you; for	Service providers Banking partners	No

identifier, online identifier, Internet Protocol address, email address, account name		from third-party sites and services	marketing and advertising; for compliance and protection	Marketing/advertising partners	Yes
Characteristics of protected classifications under California or federal law	No	N/A	N/A	N/A	N/A
Commercial information, including but not limited to records of personal property, products or services purchased, obtained or considered or other purchasing or consuming histories or tendencies	Yes	When you visit or use our Services	To provide our Services; improve, monitor, and personalize our Services; communicate with you; for marketing and advertising; for compliance and protection	Service providers Banking partners	No
				Marketing/advertising partners	Yes
Personal information categories listed in the California Customer Records Statute (e.g., name, contact details)	Yes	When you visit or use our Services; when we communicate with you; from third-party sites and services	To provide our Services; improve, monitor, and personalize our Services; communicate with you; for marketing and advertising; for compliance and protection	Service providers Banking partners	No
				Marketing/advertising partners	Yes
Biometric information	No	N/A	N/A	N/A	N/A
Internet or other electronic network activity information, including but not limited to browsing history, search history and information regarding a consumer's interaction with an internet website application or advertisement	Yes	When you visit or use our Services; when we communicate with you	To provide our Services; improve, monitor, and personalize our Services; for marketing and advertising	Service providers	No
				Marketing/advertising partners	Yes
Geolocation data	Yes	When you visit or use our Services	To provide our Services; improve, monitor, and personalize our Services; for marketing and advertising	Service providers	No
				Marketing/advertising partners	Yes
Audio, electronic, visual, thermal, olfactory or similar information	No	N/A	N/A	N/A	N/A
Professional or employment-related information	Yes	When you visit or use our Services; when we communicate with you; from third-party sites and services	To provide our Services; improve, monitor, and personalize our Services; communicate with you	Service providers Banking partners	No
Education information	No	N/A	N/A	N/A	N/A
Inferences drawn from any of the information identified in this subdivision to create a profile about a consumer reflecting the consumer's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities and aptitudes	Yes	When you visit or use our Services; from third-party sites and services	To provide our Services; improve, monitor, and personalize our Services; for marketing and advertising	Service providers	No
				Advertising partners	Yes
Sensitive personal information (as defined in CA Civil Code 1798.140 (ae))	Yes	When you visit or use our Services	To provide our Services; improve, monitor, and personalize our Services; for compliance and protection	Service providers Banking partners	No

