

熊猫速汇用户隐私协议

本隐私协议适用于 Wo Transfer (HK) Limited 公司及关联公司（以下简称“Wo Transfer 公司”）提供的熊猫速汇软件（简称“本软件”）。

一、信息的收集和使用

为了创建帐户、审核用户等方式来为您提供服务、Wo Transfer 公司会要求您提供个人信息，并且会收集其他与您相关的信息（包括但不限于日志信息、位置信息以及其他类似的特征记录）。

Wo Transfer 公司可能会将您通过自己的帐户提交的信息与 Wo Transfer 公司的其他服务或第三方的信息相结合，以便为您提供更好的体验并提高 Wo Transfer 公司的服务质量。

Wo Transfer 公司将严格遵守有关法律法规和本隐私政策所载明的内容收集、使用您的信息。除非持有 Wo Transfer 公司官方出具的授权文件，否则 Wo Transfer 公司的具体工作人员不会直接向您索要个人信息。如遇此类情况，可以直接与 Wo Transfer 公司联系。

二、个人信息的范围

基本信息 包括个人姓名、生日、性别、住址及住址证明、个人电话号码与电邮地址等。

个人信息 包括身份证、护照、面部特征、指纹信息以及 KYC 审核所需的任何其他信息。

您汇款受益人的姓名，地址，电话号码，身份证明细，银行账户信息和其他相关信息。如果您向我们提供汇款单的受益人的个人信息，您确认您已获得受益人的事先同意，以供我们收集其个人信息并查看或更改其信息。

此外为了遵循“反洗钱，反恐融资和非法活动收益法”以及可能适用的其他法律和法规时。除上述外，我们可能还需收集以下资料：您的身份证详细信息，护照详细信息，职业详情，银行账户信息，工资范围，资金来源和其他相关联系方式。

三、信息的披露

除非法律法规规定、政府部门要求或本隐私政策载明的例外情况，Wo Transfer 公司会妥善保存您的信息，不予泄漏。

您于此授权，在以下情形中，Wo Transfer 公司可以向第三方披露您的信息而无须再行获得您的同意：

(1) 如果 Wo Transfer 公司披露这些信息是用来识别、联系或向可能对 Wo Transfer 公司的权利或财产、用户或其他任何人（包括其他任何人的权利和财产）造成损害行为提起诉讼之必要；

(2) Wo Transfer 公司将个人信息提供给 Wo Transfer 公司的关联方或其他有合作关系的企业或个人，以便其代表 / 协助 Wo Transfer 公司处理这些信息。Wo Transfer 公司要求上述各方同意按照 Wo Transfer 公司的规定、本隐私政策以及有关法律法规之规定来处理这些信息；

(3) 为了向您提供一键分享服务，我们的产品集成友盟+ U-Share SDK，将收集您的设备标识信息（如 IMEI/android ID/IDFA 等）和您需要分享的社交账户公开信息，以便完成一键分享服务。为了您的信息安全，我们已与第三方 SDK 服务商进行数据安全保密约定，这些公司会严格遵守我们的数据隐私和安全要求。除非得到您的同意，我们不会与其共享您的个人身份信息。为便于您更好地了解【友盟+】采集的数据类型及用途，以及如何保护您的个人信息，您可以登陆 <https://www.umeng.com/policy> 了解【友盟+】隐私权政策。

四、信息的安全

Wo Transfer 公司将努力采取各种安全技术和程序来保护您的个人信息，包括但不限于 SSL、信息加密存储以防信息的泄漏、毁损或丢失。但同时请您理解，由于现有技术的限制以及其他可能存在的风险，即使我方平台竭尽所能加强安全措施，也无法始终保证信息绝对的安全。（特别是发生 Wo Transfer 公司无法控制的情况时，如不可抗力或第三方原因），因此，Wo Transfer 公司对隐私信息的维护或保密无法做出任何确定性的保证或承诺。如果 Wo Transfer 公司知悉其所获取并储存的数据安全受到危害或由于外部行为（包括但不限于外部安全攻击）使用户的非公开信息被披露给不相关第三方，尽管本政策中有其他免责规定，Wo Transfer 公司仍将采取其认为适当的合理措施（包括但不限于内部调查、上报并通知执法机构、以及配合执法机构工作等）。同时，Wo Transfer 公司也会在其认为适当的情况下采取合法合理措施通知相关用户，告知其被披露的信息以及 Wo Transfer 公司对该信息的知悉程度。您应当注意保护您的个人信息安全。

Wo Transfer 公司会采取必要手段、努力防止内部工作人员越权获取/利用/泄露您的信息。

五、本隐私政策修订

虽然本隐私声明说明了 Wo Transfer 公司在保护隐私方面所遵循的标准，但这些标准可能会发生变化。如有更新，Wo Transfer 公司会在发布修订版本时以 Wo Transfer 公司认为适当的方式通知您变动内容和生效日期。

Privacy agreement for Australian users

1. Introduction

1.1 We are committed to safeguarding the privacy of our website visitors and service users; in this policy we explain how we will handle your personal data.

2. How we use your personal data

2.1 In this Section 2 we have set out:

(a) the general categories of personal data that we may process;

- (b) in the case of personal data that we did not obtain directly from you, the source and specific categories of that data;
- (c) the purposes for which we may process personal data; and
- (d) the legal bases of the processing.

2.2 We may process data about your use of our website and services (“**usage data** “). The usage data may include your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. The source of the usage data is our analytics tracking system. This usage data may be processed for the purposes of analysing the use of the website and services. The legal basis for this processing is our legitimate interests, namely monitoring the use of our products and services and ensuring we comply with our legal obligations.

2.3 We may process your account data (“**account data** “). The account data may include your name and email address. The source of the account data is you. The account data may be processed for the purposes of operating our website, providing our products and services, ensuring the security of our website and services, maintaining back-ups of our databases and communicating with you. The legal basis for this processing is the proper administration of our website and business according to applicable legislation.

2.4 We may process your information included in your personal profile on our website (“**profile data** “). The profile data may include your name,

address, telephone number, email address, date of birth. The profile data may be processed for the purposes of enabling and monitoring your use of our website and services. The legal basis for this processing is the proper administration of our website and business according to applicable legislation.

2.5 We may process information contained in any enquiry you submit to us regarding products and/or services (“**enquiry data** “). The enquiry data may be processed for the purposes of offering, marketing and selling relevant products and/or services to you. The legal basis for this processing is that we will always ask for your consent before processing your enquiry data for the aforementioned purposes.

2.6 We may process information relating to transactions, including purchases of goods and services, that you enter into with us and/or through our website (“**transaction data** “). The transaction data may include your contact details and the transaction details. The transaction data may be processed for the purpose of keeping proper records of those transactions. The legal basis for this processing is the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract and our legitimate interests, namely our interest in the proper administration of our website and business.

2.7 In addition to the specific purposes for which we may process your personal data set out in this Section 2, we may also process any of your personal data where such processing is necessary for compliance with a legal

obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

2.8 Please do not supply any other person's personal data to us, unless we prompt you to do so.

3. Providing your personal data to others

3.1 We may disclose your personal data to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.

3.2 We may disclose your personal data to our insurers and/or professional advisers insofar as reasonably necessary for the purposes of obtaining and maintaining insurance coverage, managing risks, obtaining professional advice and managing legal disputes.

3.3 In addition to the specific disclosures of personal data set out in this Section 3, we may also disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

4. Retaining and deleting personal data

4.1 This Section 4 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal data.

4.2 Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.

4.3 We will retain and delete your personal data as follows:

(a) *personal data* will be retained for *5 years* following *the date of collection*, at the end of which period it will be deleted from our systems.

4.4 In some cases it is not possible for us to specify in advance the periods for which your personal data will be retained. In such cases, we will determine the period of retention based on the following criteria:

(a) the period of retention of *personal data* will be determined based on *our legal obligations*. Flexe Payments will only store information that is requested from us by law for a period of 5 years. The rest of the data held/stored by us will be deleted after the data has been processed in accordance with the General Data Protection Regulation.

4.5 Notwithstanding the other provisions of this Section 4, we may retain your personal data where such retention is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another natural person.

5. Amendments

5.1 We may update this policy from time to time by publishing a new version on our website.

5.2 You should check this page occasionally to ensure you are happy with any changes to this policy.

5.3 We may notify you of changes to this policy by email.

6. Your rights

6.1 In this Section 6, we have summarised the rights that you have under the General Data Protection Regulation. Some of the rights are complex, and not all of the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

6.2 Your principal rights under data protection law are:

- (a) the right to access;
- (b) the right to rectification;
- (c) the right to erasure;
- (d) the right to restrict processing;
- (e) the right to object to processing;
- (f) the right to data portability;

(g) the right to complain to a supervisory authority; and

(h) the right to withdraw consent.

6.3 You have the right to confirmation as to whether or not we process your personal data and, where we do, access to the personal data, together with certain additional information. That additional information includes details of the purposes of the processing, the categories of personal data concerned and the recipients of the personal data.

6.4 You have the right to have any inaccurate personal data about you rectified and, taking into account the purposes of the processing, to have any incomplete personal data about you completed.

6.5 In some circumstances you have the right to the erasure of your personal data without undue delay. Those circumstances include:

(a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;

(b) you withdraw consent to consent-based processing; and

(c) the processing is for direct marketing purposes; and the personal data have been unlawfully processed.

However, there are certain general exclusions of the right to erasure. Those general exclusions include where processing is necessary:

(a) for exercising the right of freedom of expression and information;

(b) for compliance with a legal obligation; or

(c) for the establishment, exercise or defence of legal claims.

6.6 In some circumstances you have the right to restrict the processing of your personal data. Those circumstances are:

- (a) you contest the accuracy of the personal data;
- (b) processing is unlawful but you oppose erasure;
- (c) we no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; and
- (d) you have objected to processing, pending the verification of that objection.

Where processing has been restricted on this basis, we may continue to store your personal data. However, we will only otherwise process it:

- (a) with your consent;
- (b) for the establishment, exercise or defence of legal claims;
- (c) for the protection of the rights of another natural or legal person; or
- (d) for reasons of important public interest.

6.7 You have the right to object to our processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

- (a) the performance of a task carried out in the public interest or in the exercise of any official authority vested in us; or
- (b) the purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the

processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

6.8 You have the right to object to our processing of your personal data for direct marketing purposes including profiling for direct marketing purposes. If you make such an objection, we will cease to process your personal data for this purpose.

6.9 You have the right to object to our processing of your personal data for scientific or historical research purposes or statistical purposes on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

6.10 To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

6.11 If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement.

6.12 To the extent that the legal basis for our processing of your personal information is consent, you have the right to withdraw that consent at any time.

Withdrawal will not affect the lawfulness of processing before the withdrawal.

6.13 You may exercise any of your rights in relation to your personal data by written notice to us.

7. Our details

7.1 **Flexewallet Pty Ltd.** is registered in Australia, with our offices located at Level 3, 461 Bourke Street, Melbourne 3000, Victoria, Australia.

Updated as at 06 June 2019

日本市场隐私协议

株式会社N & P JAPAN（以下「当社」といいます。）は、「個人情報の保護に関する法律」に基づき、会員の個人情報を下記のように取り扱います。

第 1 条（個人情報の利用目的）

1.当社は、お客さまの住所・氏名・郵便番号・電話番号・FAX番号・メールアドレスなどの個人情報をお預かりいたします。これらの個人情報は、次の目的で利用させていただきます。また、明示した目的の範囲を 超えて利用する必要が生じた場合には、事前にご連絡の上、同意を得るものとします。

【お預かりした個人情報の利用目的】

当社は、「個人情報の保護に関する法律」を遵守し、当社が行う海外送金サービスに関するご案内・ご提案、契約の締結・履行、アフターサービスの実施、お客さまへの連絡・通信、新しい商品・サービスの開発、及び、お客さまに有益と思われる情報の提供などのために、お客さまの個人情報を利用させていただきます。

2.当社が業務の提供・運営のために、個人情報を入手する場合には、入手する個人情報について、適切に入手したものであるかどうかを提供者へ確認を行い、必要な手続を実施の上で入手するものとします。

第2条（個人情報の保管）

1.当社は、会員情報、会員のマーケティングに関する意向及び会員の取引履歴を、法令等に従い、情報の取得目的に必要な期間内に限り、保管します。

2 当該保存期間内に会員が新たな取引を行わない場合には、会員情報及び会員のマーケティングに関する意向に関する情報は削除されます。

第3条（個人情報の委託）

当社は、業務を円滑に遂行するために、業務の一部を第三者に委託する場合がありますが、業務の委託に伴い、個人情報を預託する場合には、できる限り範囲を限定するようにします。また、当社の定める基準に基づき個人情報を適正に取り扱っているかどうかについて、定期的に確認します。なお、現時点での委託先は、次のとおりです。

(1) FUTURE FINTECH INTERNATIONAL 社 (所在国: 香港)

(2) NNP KOREA 社 (所在国: 韓国)

第 4 条 (個人情報の第三者提供)

1. 当社は、あらかじめ会員の同意を得ることなく個人情報を第三者に提供することはありません。ただし、以下の場合は除きます。

①法令に基づく場合

②人の生命、身体又は財産の保護のために必要がある場合であって、本人の同意を得ることが困難であるとき

③公衆衛生の向上又は児童の健全な育成の推進のために特に必要がある場合であって、本人の同意を得ることが困難であるとき

④国の機関若しくは地方公共団体、又はその委託を受けた者が法令の定める事務を遂行することに対して協力する必要がある場合であって、本人の同意を得ることにより当該事務の遂行に支障を及ぼす恐れがあるとき

2.前項に掲げる場合のほか、当社は、会員からの反対のお申出があった場合を除き、会員に対する商品及びサービスの提供を把握し、向上させるため、会員情報を他の第三者に開示します。

第5条（個人情報に関する開示・訂正の請求）

1.お客様は、当社の定める方法により、法令に定める範囲内で、自らの情報を閲覧及び謄写をすることができます。なお、閲覧又は謄写には当社所定の手数料が必要となります。また、閲覧又は謄写の方法については、当社所定の方法によるものとします。

2.開示請求に伴い取得した個人情報は、開示請求に必要な範囲のみで取り扱うものとし、提出いただいた取引時確認のための書類は、回答終了後速やかに、当社が定める個人情報の廃棄手続により処理します。

3.お客様は、不完全、不正確又は失効した会員情報を訂正、消去又は停止を求めることができます。

4.お客様は、法令に基づき、会員情報の処理に関する特定の状況について（会員情報の処理が本サービスを完了するために必要な場合を除きます）、正当な理由がある場合には異議を述べるすることができます。

5.第1項、第3項及び第4項に定める権利を行使される場合、又は当社から以降のご案内を受領することを希望されない場合には、当社までご連絡下さい。

Euro Privacy Policy for European customers

Wo Transfer's remittance partner in Eruo is EasyEuro. You hereby agree to the following agreement when using remittance service in Eruo:

EasyEuro (Kitakami Limited) is an innovative global payment service provider, and is recognised worldwide as a financial connection to corporates and their business partners. This Privacy Notice describes our data privacy practices and policies when you interact with us. If our practices and policies change, we will update this Privacy Notice.

EasyEuro is committed to protect your data, privacy, personal and financial information, in accordance with the privacy and data protection regulation of the jurisdictions within which we operate.

Scope of this Privacy Notice

This Privacy Notice applies when you interact with EasyEuro, including all regions in the world.

For example, this Privacy Notice applies when you:

Use EasyEuro, either directly or through our website or mobile applications;

Interact with EasyEuro on social media;

Contact EasyEuro's office;

This Privacy Notice does not apply to the policies and practices of companies that are not related to EasyEuro. We are not responsible for other company's

privacy policies and practices. We don't endorse other company's policies and practices when provide a link to a website.

We do not knowingly attempt to solicit or receive information from children or minors per local law.

1. Why we collect and process Personal Information

We collect and process Personal Information so we can provide you with our products and services. This includes:

Processing your application;

Providing you service with our website and APP;

Answering your inquiries;

Identifying you in accordance with our obligation under the applicable regulation and law, including Anti-Money Laundering and Counter Terrorism Financing Act;

Performing administrative and operational tasks (including systems development and testing, staff training, and market or customer satisfaction research).

We also collect your Personal Information so that we can contact you and provide you with information about products and services that may be of interest to you.

2. Who do we collect information about

Where reasonable and practical we will only collect your Personal Information directly from you. However, we may also collect information about you from third parties, such as a partner or spouse who contacts us on your behalf, from our contractors who supply services to us, from advisers such as accountants or lawyers or from other organisations authorised by you.

If you provide Personal Information to us about someone else, you must ensure that you are entitled to disclose that information to us and that we can collect, use and disclose that information as set out in the Policy without having to take any further steps required under law (such as obtain that person' s consent). This means that if you provide us with 'Personal Information about someone else' , you must make sure that the individual concerned understands the matters set out in this Policy and has provided their consent to be bound by this Policy.

3. Personal Information and other information we may collect

EasyEuro collects Personal Information Data. When you interact with us we may collect Personal Information that identifies you as an individual or relates to you as an identifiable individual.

Personal Information we collect may include your:

First and last name;

Address;

Contact information;

Date of birth;

Information to confirm your identity;

Financial information (including business certificates, bank account information, accounting information and payment reasons).

We may collect additional information, such as your country of birth or your government identification. Unless we specifically request it, please do not share with us sensitive Personal Information (e.g., information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership).

Other Information

We may also collect other information that by itself doesn't identify you. This may include:

Browser and device information;

Mobil application usage data;

Details of the transactions you carry out when using our Services, including geographic location from which the transaction originates;

Information collected through cookies, pixel tags and other technologies;

Demographic information and other information provided by you that does not reveal your specific identity;

Information that has been aggregated in a manner that it no longer reveals your specific identity. We may merge Personal Information and other information. We will treat this information as Personal Information if we are required to by law;

Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website or App (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our Customer Support number.

4. How do we collect and protect your Personal Information

We collect Personal Information directly from you, and from other sources. We and our service providers collect Personal Information in a variety of ways, including:

Directly from you: when you interact with us when you contact us by telephone, email or via our App or via our website; you create or update a user profile that includes Personal Information such as your name and contact details; you apply for one of our products or services; you apply for employment with us.

For example, we collect Personal Information from you if you use our services, call our call centre, or apply to become an agent. If you provide information about someone else, you represent that you have permission to do so.

Indirectly from other sources: such as public databases, joint marketing partners, social media platforms (including from people with whom you are connected), and from other third parties. If you connect your EasyEuro profile to your social media account(s), some Personal Information from your social media account will be shared with us, which may include Personal Information that is part of your profile or your connections' profiles in social media.

How We Collect Other Information

We collect other information in a variety of ways, including:

Through your browser or device: most browsers collect certain information automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, or internet browser. We use this information to ensure that the services we provide function properly.

Through your IP address: An IP (Internet Protocol) address is a unique identifier that electronic devices use to identify and communicate with each other on the internet. We may identify your IP address and log it into our server log files when you access our websites or mobile applications, along with the time and page(s) you visit. When you visit our website, we may view

the IP address of the computer or device you use to connect to the internet.

Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for a variety of reasons, such as calculating usage levels, diagnosing server problems and administering the services.

Through the EasyEuro mobile application: if you download and use a EasyEuro mobile application, we may track and collect usage data, such as the date and time your device accesses our servers and which information and files have been downloaded.

From your physical location: we may collect the physical location of your device by, for example, using satellite, cell phone tower or Wi-Fi signals. We may use your device' s physical location to provide you with personalized location-based services and content. We may also share your device' s physical location, combined with information about advertisements you view and other information we collect, with our marketing partners to enable them to provide you with more personalized content and to study the effectiveness of advertising campaigns. You may be able to allow or deny such uses and/or sharing of your device' s location, but if you do, we and/or our marketing partners may not be able to provide you with personalized services and content.

5. How do we use Personal Information and other information

We will only use your Personal Information for the purpose for which it has been provided, for reasonably related secondary purposes, any other purpose you have consented to and any other purpose permitted under the Privacy Act.

The ways that we use your Personal Information may include:

Complete your transactions, respond to your questions, and provide you with customer service;

Send you transactional and other administrative messages;

Personalize your experience when you use our services;

Invite you to participate in sweepstakes, contests and similar promotions, and to administer these activities, which may have additional notices about how we use and disclose your information;

Operate and grow our business (e.g., conduct data analysis; audit our activities; develop new products; enhance, improve and modify our services; identify usage trends; determine the effectiveness of our promotional campaigns);

Monitor and prevent fraud, money laundering, abuse, and other actual and potential prohibited or illegal activities;

Meet legal, auditing, regulatory, insurance, security and processing requirements;

Report to credit bureaus;

Respond to court orders and legal investigations;

Deliver marketing communications to you about our services and other companies' services, including offers, coupons or incentives we believe may be of interest to you. These marketing communications may come from us directly, or through our affiliates or third parties, including our agents who facilitate transactions on our behalf;

Comply with applicable laws, which may include laws outside your country of residence;

Respond to requests from public and government authorities, which may include authorities outside your country of residence;

Cooperate with law enforcement, or for other legal reasons;

Enforce our terms and conditions;

Protect our rights, privacy, safety or property, and/or that of our affiliates, you or others. We may also use information in other ways with your consent or as permitted or required by applicable law.

6. Where we store your data and how we retain them

We keep information only as long as necessary. We keep information if necessary for the purpose it was collected, or for a longer retention period as required or permitted by law. Once information is no longer needed for its initial purpose, it will be deleted in accordance with our policies and procedures.

7. Disclosure of your information

EasyEuro shares and disclose information with our affiliates, vendors, and other third parties. We share and disclose information with:

Our subsidiaries of EasyEuro and affiliated entities for the purposes described in this Privacy Notice (EasyEuro – Kitakami Limited. is the party responsible for the management of jointly-used Personal Information);

Our vendors or contractors that provide us with services related to information technology, such as website hosting, data analysis, payment processing, order fulfilment, information technology and related infrastructure provision, customer service, and email delivery;

Our vendors that provide us with services related to our marketing communications and campaigns, consistent with your choices, including any applicable choices we provide for you to opt into such sharing;

Our vendors that assist us with sweepstakes, contests and other promotions;

Your social media connections, other website users and your social media account providers if you connect your EasyEuro profile with your social media account(s);

Other third parties in the event of a reorganization, merger, sale, joint venture, assignment, transfer or other disposition of our business, assets or stock, or in any bankruptcy or similar proceedings.

You consent to us disclosing your information to such entities without obtaining your consent on a case by case basis.

8. Jurisdiction and Cross-Border Data Transfers

If you are a resident of the European Economic Area (EEA), when you give us your Personal Information, we will protect it in accordance with the General Data Protection Regulation (GDPR). We will also comply with the GDPR if we process your Personal Information in the EEA. For GDPR purposes, we are the 'controller' of your information.

We are based in and operate from the France and United Kingdom. When you interact with us, your information may be sent to a country other than your own, including the France and United Kingdom, for processing and storage. You also understand and agree that data protection rules of other countries may be different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your information.

Personal Information collected in the European Economic Area is controlled by EasyEuro. EasyEuro maintains adequate measures, such as Model Contractual Clauses approved by the European Commission, for the international transfer of Personal Information collected in the EEA and Switzerland. Please contact us if you would like more information.

9. Data security

We are seriously committed to using appropriate organizational, technical and administrative measure to protect personal and other information. All information we collected is stored on our secure servers. Any payment transactions will be encrypted with highest security standard.

As you will know, no data transmission or storage system can be guaranteed to be 100% secure. . Although we will do our best to protect your personal data, we cannot guarantee the security of your data during transmission, and 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 unauthorised access.

10. Marketing communication

We may liaise with third parties to deliver advertising and marketing messages that may interest you. These companies may place or recognise a unique cookie on your browser (including pixel tags). They may also use these technologies, along with information they collect about your online use, to recognize you across the devices you use, such as a mobile phone and a laptop. For more information, and to learn how to opt out of these technologies, visit [www.choicelife.com](#) and you may download the AppChoices app at [www.choicelife.com](#) to opt out in mobile apps.

11. Cookie

Some of the Cookies used by us will be automatically deleted from your hard drive at the end of your browser session (Session Cookies). We also use Cookies which remain on your hard drive for a certain period after the end of your browser session (Persistent Cookies). Then on your next visit, the country and language you selected on your last visit to our Website will immediately be recognised. These Persistent Cookies will be stored on your hard drive and deleted by the browser after the prescribed period. These Cookies may also include Cookies from third-party providers (Third-Party Cookies).

12. Your legal right

Your Marketing Choices

You have control over the marketing communications you receive from us.

You can opt out from receiving marketing communications from us by:

Updating your choices on your EasyEuro profile;

Clicking on the “unsubscribe” link at the bottom of an EasyEuro marketing email;

Replying “STOP” to a text or SMS message;

Contacting us at: info@easyeuro.eu We will respond to your request as soon as reasonably practicable. Please note that if you opt-out of receiving

marketing-related emails from us, we may still send you transactional or administrative messages.

Accessing Your Personal Information

You can access, change or suppress your Personal Information. You can review, correct, update, suppress, restrict or delete Personal Information that you have given to us, or receive an electronic copy of your Personal Information to transmit it to another company (to the extent provided to you by applicable law), by contacting us at: info@easyeuro.eu. We will respond to your request without undue delay. For your protection, we may need to verify your identity before implementing your request.

Please note that we may need to keep certain information for recordkeeping purposes or for regulatory compliance. There may also be residual information that will remain within our databases and other records, which will not be removed.

13. Further enquiries and complaints

Generally: EasyEuro (Kitakami Limited), is the company responsible for the collection, use and disclosure of your Personal Information under this Privacy Notice.

If you have questions about this Privacy Notice or our privacy practices, or would like to request access to your information, please contact our Data Protection Officer at or:

In the EEA: If you live in the EEA and have questions about this Privacy Notice or our privacy practices, or would like to access your information, please contact our EU Data Protection Officer by email to support@easyeuro.eu. You also have the right to lodge a complaint with a supervisory authority competent for your country or region.