

## WEEZMO PRIVACY POLICY

- **GENERAL**

Weezmo Technologies Ltd. (“we”, “us”, “our”, “Company” or “Weezmo”), a part of the Nayax Group (as defined below), is committed to protecting the privacy of our clients, their consumers and visitors of our website, all as further detailed below. We take several precautions and have implemented certain mechanisms to ensure the protection of Personal Data (as defined below), as well as to comply with applicable privacy and data protection laws.

“Nayax Group” refers to Nayax Ltd. affiliated companies. **Please note, that in case you are using additional, supplementary or other services offered by the Nayax Group, additional and/or other terms may apply to you, with respect to such services you subscribed to, as indicated in the applicable agreement executed between you and the relevant Nayax entity and as specified in [Nayax's Privacy Policy](#).**

This Privacy Policy (“Privacy Policy”) is an integral part of our **Terms of Use** and governs the collection, processing, usage and transfer of data by us from: (i) individuals who access and use this website (respectively, “Website” and “Visitors”); (ii) consumers of our clients (i.e., Merchants, as defined below) who use our services (“Consumers”); and (iii) Merchant’s personnel. Any of the above: “you” or “User”.

This Privacy Policy explains how you can exercise your rights related to your Personal Data, in accordance with the laws and regulations applicable to you (which may include for example the EU General Data Protection Regulation (“GDPR”) and the California Consumer Privacy Act (“CCPA”). In the event you are a California resident and the CCPA applies to you – please make sure to review our [CCPA Privacy Notice](#).

If you have any questions regarding this Privacy Policy, please send any inquiries to: [privacy@nayax.com](mailto:privacy@nayax.com).

- **OUR SERVICES**

As an essential part of our business, we offer our clients, i.e., merchants (“Merchants”), a solution enabling them to send Consumers e-receipts for their purchases, and to interact with their Consumers (“Weezmo Solution”). In this framework, we process certain Personal Data as a data processor on behalf of the Merchants. We also operate a web platform which enables Consumers to access their e-receipts received from various Merchants, available at: <https://www.weezmo.com/home-customers> (“Weezmo Inbox”). With respect to the processing of data in connection with the Weezmo Inbox, we process Personal Data as a data controller. For the purpose of this Privacy Policy, Weezmo Solution and Weezmo Inbox shall be collectively referred to as the “Services”.

- **WHAT IS PERSONAL DATA?**

Personal Data is any information which identifies or can be reasonably used to identify a natural person. Such data includes for example: first and last name, phone number, email address, unique online identifiers, billing information, credit card details, etc.

As opposed to Personal Data, non-personal data, or anonymized data, is information which does not identify a specific natural person and cannot reasonably be used for such identification. This type of information includes for example aggregate or statistical data.

• **PERSONAL DATA PROCESSED IN THE CONTEXT OF WEEZMO'S SERVICES:**

Types of personal data processed	Purposes of processing	For EU persons – Legal Basis under the GDPR
<b><i>Below is a list of our processing activities related to Personal Data processed by us as a data processor.</i></b>		
<p><b><u>Weezmo Solution</u></b></p> <p><b>Personal Data related to Consumers is processed by us on behalf of the Merchant (i.e. our clients, who are the controllers of the Personal Data), in accordance with the Merchant's Privacy Policy.</b></p> <p><b>Please review the Merchant's privacy policy for more information on how it processes your Personal Data.</b></p> <p>We process the following personal data on behalf of the Merchants, to provide them with the Weezmo Services:</p> <ol style="list-style-type: none"> <li>i. Mobile phone number.</li> <li>ii. 4 digits of credit card number.</li> <li>iii. Data regarding the purchases made at the Merchant's location, such as products purchased, prices, location of purchase, date of purchase.</li> <li>iv. Additional data included by the Merchant in the original receipt (attached to the e-receipt). While we encourage our clients not to include any redundant data in the original receipts, we do not control what data is added to the original receipt by the Merchant, which is governed by the Merchant's privacy policy.</li> <li>v. The Merchant using our services may also opt to process (and instruct us to process on its behalf),</li> </ol>	<ul style="list-style-type: none"> <li>• To provide the Merchants with Weezmo's Services.</li> <li>• To send you the Merchant's receipt.</li> <li>• To prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts and other misuses of the Services, to protect the security or integrity of our databases, websites and services, and to take precautions against legal liability.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The legal basis for processing will be determined by the Merchant. Please refer to the Merchant's privacy policy for full details. The following are examples of lawful basis that Merchants may rely on: <ul style="list-style-type: none"> <li>▪ Necessity of processing for the purposes of the legitimate interests of Merchant.</li> <li>▪ To perform a contract to which the data subject is a party to on behalf of Merchant.</li> <li>▪ To fulfil legal obligations under applicable laws.</li> </ul> </li> </ul>

<p>additional data, such as in relation to forms and services you interact with on the Merchant's website and online pages and content. For example, if you register to receive newsletters from the Merchant, or join the Merchant's customers club or loyalty program, we will process data provided by you in connection with such activities.</p> <p>vi. Additional information may be processed in the context of cookies and similar technologies which the Merchant uses. Such information may include, browsing history, purchasing and online behavior and activities.</p>		
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***Below is a list of our processing activities related to Personal Data processed by us as a data controller.***

<p><b><u>Weezmo Inbox and Technical Data</u></b></p> <p>When you access the Weezmo Inbox, the information from your receipts will be aggregated and presented to you.</p> <p>We collect certain technical information transmitted by your device when accessing the Website or the Weezmo Inbox, this information includes: type of the device used, date and time stamp and language, preference approximate geolocation (i.e., country), and user's actions such as page views, search queries, etc. Please note that if you access certain services and databases via mobile app we will collect the precise location of your device at the time of such access.</p> <p>Please note that your e-receipts contain personal data which may be sensitive, or included in Special Categories of Personal Data (as defined below). For example, if you opt to receive an e-receipt at a drug store, the content of your e-receipt will</p>	<ul style="list-style-type: none"> <li>• To provide you with the Weezmo Inbox service.</li> <li>• To improve Weezmo Inbox, identify any difficulties or failures in the process, for analysis, statistics and customization of the services.</li> <li>• To resolve any disputes, communicate with you regarding customer service and support issues, and to respond to questions or comments and help resolve any problems.</li> <li>• To prevent potentially prohibited or illegal activities, fraud,</li> </ul>	<ul style="list-style-type: none"> <li>▪ Necessity of processing for the purposes of our legitimate interests.</li> <li>▪ To perform a contract to which the data subject is a party to.</li> </ul>
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<p>include information on products purchased which may indicate as to certain health information.</p>	<p>misappropriation, infringements, identity thefts and other misuses of services, to protect the security or integrity of our databases, websites and services, and to take precautions against legal liability.</p>	
<p><b><u>Visitors of the Website</u></b></p> <p>When you visit or use our Website, we may also collect Personal Data, such as:</p> <ul style="list-style-type: none"> <li>• Your name and contact information, or anything else you actively post or upload to the Website;</li> <li>• When you answer surveys, feedbacks or polls, interact with us in connection with loyalty registration, reviews, transcripts, or provide feedback on our forums and blogs, we will process the recordings of your communications with us.</li> </ul>	<p>To answer your queries and provide you with the services you requested from us.</p>	<ul style="list-style-type: none"> <li>▪ Necessity of processing for the purposes of the legitimate interests of us.</li> <li>▪ Your consent.</li> <li>▪ To perform a contract we may have with you.</li> </ul>

As used above, “**Special Categories of Personal Data**” means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation

- **IS A DATA SUBJECT LEGALLY OBLIGATED TO PROVIDE PERSONAL DATA TO US?**

You are not required by law to interact with us or provide us with Personal Data. If you choose to use any of our Services, or if you choose to use or purchase products from Merchants who implemented the Weezmo Solution, we will process certain Personal Data (as detailed above) in order to deliver to Merchants and you, as applicable, our Services.

- **IS PERSONAL DATA REGARDING CHILDREN COLLECTED BY US?**

Our Services are not directed to persons under 16 years old. If a parent or guardian becomes aware that his or her child has provided us with Personal Data without their consent, he or

she should contact us immediately. We do not knowingly collect or solicit Personal Data from a child.

- **WHAT ARE DATA SUBJECT RIGHTS AND HOW CAN THEY BE EXERCISED?**

Data subject rights are rights which data subjects have in relation to their personal data. Data subject rights are determined by the relevant legal jurisdiction applicable to the specific circumstances or to each data subject.

Data subject rights include (depending on your jurisdiction and applicable law):

- the right to receive confirmation whether or not we process your Personal Data;
- the right to access your Personal Data and receive a copy of the Personal Data that we hold.
- the right to rectification of your Personal Data;
- the right to erasure of your Personal Data.
- the right to restrict processing of your Personal Data.
- the right to object to processing of your Personal Data;
- the right to data portability.
- the right to lodge a complaint to a supervisory authority; and
- the right to withdraw consent to processing of Personal Data.

We may request additional information from you when you contact us with a request concerning your data subjects rights in order to: (i) verify your identity; (ii) determine the applicable laws; (iii) and locate your data.

If we receive a Data Subject Request from a Consumer in relation to a receipt received from a specific Merchant, we will notify the relevant Merchant and will refer the Consumer to the relevant Merchant.

To learn more about your data subject rights and how to exercise them, please visit our [User Rights Policy](#).

- **HOW CAN DATA SUBJECTS CONTACT WITH US WITH QUESTIONS OR CONCERNS ABOUT PRIVACY AND PERSONAL DATA?**

If you have any questions, concerns or requests in relation to your privacy or personal data, you are welcome to contact us, by sending an email to: [privacy@nayax.com](mailto:privacy@nayax.com).

You may also contact us using the following contact information:

**Weezmo Technologies Ltd.**

3 Arik Einstein St., Herzliya 4659071 Israel

+97237694380

EU residents may also contact us by using the following details of our EU entity:

Nayax Europe UAB

Antakalnio 17, LT-10312, Vilnius, Lithuania

- **WITH WHICH THIRD PARTIES DO WE SHARE PERSONAL DATA?**

WE DO NOT SELL OR RENT ANY OF YOUR PERSONAL DATA TO NON-AFFILIATED THIRD PARTIES FOR THEIR MARKETING PURPOSES.

- **The Merchant you purchased from** - When we process Personal Data on behalf of Merchants who subscribed to the Weezmo Solution, we share Personal Data collected in the framework of such services with the relevant Merchant. We may also share Personal Data on the Merchant's behalf with other service providers of the Merchant, in accordance with the Merchant's instructions.
- **Service Providers** - We share personal data with our service providers, data processors and sub-processors. These service providers assist us in operating our services, conducting our business, expanding our business or servicing our customers, and for personalizing user experiences of the Services, and include for example cloud storage services, billing services, marketing and analytics, maintenance and technology services.

You can see a list of such third parties below. While we strive to keep this list current, updated and complete, it is possible that there are additional processors which we have not yet added to the list. If you have any inquiries related to our service providers please contact us. Please note, the following chart details Weezmo's third party service providers divided into categories of residency.

Company Name	Location	Description/purpose of processing	Personal Data Transferred
All Users (except for Russian Users)			
Amazon Web Services	EU/EEA	Hosting	All data included in the receipts.
Twilio Inc.	EU/EEA	Hosting	All data included in the receipts.
Israeli Users only			
Teleclal Group	Israel	SMS delivery	SMS content
019 Mobile Ltd.	Israel	SMS delivery	SMS content
Unicell Advanced Cellular Solutions	Israel	SMS delivery	SMS content
Russian Users only			
Yandex Cloud	Russia	Hosting	All data of Russian Users included in the receipts.

- **For legal purpose** - We may share Personal Data to third parties where required to comply with a legal requirement, for the administration of justice, to protect the vital interests of data subject or the vital interests of others, to protect the security or integrity of our databases and services, and to take precautions against legal liability.

- **Change of control** - In the event of a corporate transaction (e.g., sale of a substantial part of our business, merger, consolidation or asset sale, etc.), we may share personal data with our affiliated companies or acquiring company, which will assume the rights and obligations as described in this Privacy Policy.
- **Within the Nayax Group** - We may share certain Personal Data within the Nayax Group, where certain affiliated companies provide services to assist other entities in the group in the provision of services.
- **E-Wallets and Financial Management Apps** – we may share certain data with third parties who provide Data Subjects with platforms for management of transactions and financial data (such as e-wallets, online banking, etc.), for the purpose of enabling the Data Subject to access his/her data and provide the Data Subject with the third party's services.

- **DO WE USE COOKIES?**

Yes. For more information on the cookies we use and the purposes of such cookies, please read our **Cookie Policy**. You may at any time program your browser to block cookies, or use the cookie-banner implemented on our Website to adjust your preferences, but please be aware that such blocking may prevent us from providing certain services to You. These cookies help us track how visitors use the Website and our Services.

- **DO WE TRANSFER PERSONAL DATA INTERNATIONALLY?**

Nayax Group is an international corporation, operating globally, with offices and data centers in various jurisdictions around the world. Therefore, Personal Data may be transferred across international borders in the framework of our services, including to Israel, the US and Europe. International transfers of data are done with appropriate measures to ensure that your Personal Data receives an adequate level of protection as required under applicable law. Further, when Personal Data collected within the EU is transferred outside the EU (and not to a recipient in a country that the European Commission has decided provides adequate protection), it shall be transferred in accordance with the provisions of the ***Standard Contractual Clauses*** approved by the European Union (if applicable). If you would like to understand more about these arrangements and your rights in connection therewith, please contact us at: [privacy@nayax.com](mailto:privacy@nayax.com).

- **DO WE SEND MARKETING MATERIALS TO USERS?**

We may send users of the Services or users who provided us with their consent with information on new products, features, activities, services and periodic announcements or newsletters. You may opt-out any time from such communications at any time by either: (i) using the “unsubscribe” feature available within the message; or (ii) sending us an email to: [privacy@nayax.com](mailto:privacy@nayax.com).

- **HOW DO WE PROTECT PERSONAL DATA?**

We implement extensive security measures to reduce the risks of damage, loss of information and unauthorized access or misuse of personal data. We implement appropriate data collection, storage and processing practices and security tools to protect personal data against unauthorized access, alteration, disclosure or destruction.

You should be aware that no security measures are completely fail-proof, and it is impossible to prevent any and all threats to the security of data and systems. Therefore, you should be aware that any processing of digital personal data holds certain inherent risks, and we cannot

guarantee that our services and databases will be immune to any wrongdoings, malfunctions, unauthorized interceptions or access, malware attacks or other kinds of abuse and misuse.

- **INFORMATION FOR RESIDENTS OF CALIFORNIA UNDER THE CCPA**

For information relevant to residents of California in accordance with the CCPA, see the following [CCPA Notice](#).

- **DATA RETENTION**

Unless you or the Merchant (as the case may be) instruct us otherwise, and subject to applicable laws, we retain the information we collect for as long as needed to provide our Services and to comply with our legal obligations, resolve disputes and enforce our agreements, if applicable.

- **APPLICABLE LAWS**

The provisions included in this Privacy Policy relating to matters that may be regulated under the GDPR or CCPA and therefore will apply only to the processing of Personal Data (or Personal Information) which is subject to the GDPR or CCPA in accordance with the applicability provisions contained therein.

- **CHANGES TO THIS PRIVACY POLICY**

We may, at any time and from time to time, modify this Privacy Policy. Modifications to this Privacy Policy will be posted on the Website, and shall be effective as of the date in which they are posted on the Website.