



# **Exhibit A**

# **PRIVACY POLICY**

Please note: by using the website [paymentcourier.com](https://paymentcourier.com) and [pymnt.io](https://pymnt.io), you automatically agree to be bound by the provisions of this Privacy Policy

## **1. Target Group**

The provisions of this Privacy Policy shall generally apply to all employees, contractors and business partners, as well as customers of Payment Courier Ltd. (domiciled at: 71-75 Shelton Street, Covent Garden, London, United Kingdom, WC2H 9JQ; company number: 09818102; hereinafter called “Payment Courier”) hereby acting as data manager.

All contractors and business partners or any designated third parties duly authorised and participating in the fulfilment of the underlying contractual relationship shall have proper data protection and non-disclosure regulations in force governing the management of identification data and personal data at least to an extent equal to the provisions of this Privacy Policy, which constitutes an integral part of Payment

Courier's General Terms and Conditions as frequently amended.

## **2. Purpose of this Policy**

Compliance with data protection regulations is ultimately aimed at safeguarding the personal rights and vested interest of all customers, employees, contractors, business partners as well as any related third parties (henceforth collectively referred to as "Users") who might get in touch with the services provided by Payment Courier by whatever means, whether through services, via online content or in the form of licences. Therefore, the primary purpose of this Privacy Policy is to ensure the comprehensive protection of all business related data (including in particular personal data), while having regard not only to the applicable legal regulations governing data protection, confidentiality and information security, but also to the customers' fundamental confidence in Payment Courier's informational due diligence constituting a data management system free of undue risks and burdens.

This Privacy Policy provides a comprehensive guideline for the collection, storage and possible processing of Users' data, thus outlining what data are collected and for which purpose they are used, stored or otherwise dealt with. In addition, this Policy stipulates both the technical and formal measures that are necessary to be taken for data protection, in line with the applicable data protection regulations and by any operation of law.

Within the meaning of this Exhibit, the User or Users include the Merchant and any of Merchant's customers and all visitors or third-party users using the software-based payment platform operating through Payment Courier's website.

## **3. Effective Scope of Data Management**

In general, Payment Courier acts as data manager handling corporate identification data provided by the Users solely for the purpose of fulfilling purchase orders, following up on the terms and status of the relevant order as well as sending newsletters. As Payment Courier's software run with absolutely no back-door access, Users' data content and their way of application remain completely hidden from Payment Courier. Correspondingly, neither business information nor personal data are processed by Payment Courier, whatsoever.

### **3.1 Timeframe of Data Management**

Payment Courier stores all data for the period of time duly prescribed by the relevant legal provision governing data manager's obligation to keep records.

### **3.2 Data Stored by Payment Courier**

Different types of user data are saved upon service request and purchase order. Such data are the following: cookies (used for tracking Users), data for business-to-business relations (business entity's corporate name, registered address, e-mail, etc.), and IP address (geolocation).

#### *Automatically collected non-personal information*

The website operates with login and a registered Merchant Account. When visiting Payment Courier's website, the system automatically obtains specific data from the Users without they being logged in or registered for the website. These data comprise non-personal information indicating purely technical features about the Users' visit, including – in particular – the following data: type of web browser, operating system, domain address of the source website, number of visits, average duration of visits, pages visited. Users shall take note of the fact that these data may also be shared with Payment Courier's business partners in order to survey the proper functioning of the website as well as to keep track of improvements.

#### *Identification data*

For the provision of online services, and in particular for the granting of licences, Payment Courier shall collect certain corporate data, which are used exclusively for identifying the party placing the order, including responding to enquiries, making offers and fulfilling orders. These data include cookies, IP addresses and corporate email addresses, which are stored for an indefinite period of time, however no longer than the period provided for by relevant legal regulations stipulating Payment Courier's obligation to keep records following the termination of service.

### **3.3 Transmission of Data to Third Parties**

Data of the Users are accessible solely to Payment Courier and his employees. Without prior written consent of the party concerned, Payment Courier shall not transfer any

data to any third party. In compliance with the provisions laid down by Point 4 (below) of this Privacy Policy, Payment Courier is entitled to transfer certain data to duly authorised third parties if the third party is one engaged in the fulfilment of the underlying contractual relationship such as a subcontracting courier service, postal carrier, etc.

Furthermore, the website [www.paymentcourier.com](http://www.paymentcourier.com) and [www.pymnt.io](http://www.pymnt.io) operated by Payment Courier may make use of various maintenance and hosting services, the operation of which is governed by jurisdictions outside of the European Economic Community, thus applying regulations that might guarantee a level of data protection differing from the one prevailing within the territories of the European Union. Therefore, Payment Courier shall ensure that his prudent choice of service provider will guarantee at least the same standards of data protection as the one applicable within the European Union.

### **3.4 Use of Identification Data**

Identification data may only be used for the purpose of identifying customers. Payment Courier must not sell, use for marketing purposes or otherwise commercialise any data thereby collected from the Users.

## **4. General Principles of Data Protection**

For the purpose of this Privacy Policy the following principles shall ultimately prevail:

### **4.1 Admissibility of Data Management**

The management of personal data is legally permissible only if at least one of the following prerequisites is fulfilled:

- the party concerned is sufficiently aware of and consents to data management
- data management is carried out for the purpose of fulfilling a contractual relationship with the party concerned
- data management is required by Payment Courier for his own legally justifiable interests, provided that it is not to be reasonably anticipated that the vested interest of any third party would be thereby infringed
- data management (or data processing) is compulsory or admissible by national law

Supplier shall be solely liable for data management arising out of or in connection with the provision of Services or the sale of products marketed through the website [www](http://www).

paymentcourier.com and www.pymnt.io, while handling all personal data pursuant to the currently applicable provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (shortly referred to as “GDPR”).

## **4.2 Intended Purpose**

Personal data may exclusively be used (i.e. managed and processed) for particular, distinct and legally permissible purposes.

## **4.3 Data Economy**

All personal data shall be verifiable, complete, true and valid and – if necessary – continuously kept up-to-date. Supplier shall use his best endeavours and take all reasonable measures to ensure that inaccurate or incomplete data are immediately deleted and followed up on. Any and all data management shall have as its main goal to collect and process as little amount of data as possible and to avoid excessive use thereof. In case of specific data deemed necessary for the provision of services, Payment Courier shall have the right to make use of anonymisation and pseudo-anonymisation on condition that such measure is proportional to the intended purpose.

The website www.paymentcourier.com and www.pymnt.io transmits cookies to the Users’ devices in order to support the proper display of graphical elements as well as to collect non-personal data necessary for user profiling through the website. (For further information hereto, please consult our Cookie Policy.)

## **4.4 Erasing Data**

All data, including personal data, which are no longer used for the intended business purpose are erased in line with the relevant legal provisions stipulating Payment Courier’s duty to preserve records.

## **4.5 Earmarking for Particular Purposes**

Personal data which are intended to be applied solely for the purpose of ensuring robust data security as well as the proper and efficient functioning of the data protection system must exclusively be used for that particular purpose.

## **4.6 Data Security**

Payment Courier along with his contractors and business partners as well as their employees and agents are obliged to take all reasonable precautionary measures, whether formal or technical, to effectively avoid any loss of data, in particular to counter inadvertent or wrongful deletion, modification, counterfeiting, manipulation or unauthorised disclosure of data or any unauthorised access to data.

## **4.7 Information Transparency**

In the unlikely event of having to process personal data, which is generally excluded in Payment Courier's business-as-usual operations, the party concerned shall be duly notified of the process prior to any related action. Such notices are sent to each party concerned via e-mail correspondence, specifying in particular:

- (i) identity of the authorised party
- (ii) purpose and timeframe of data management
- (iii) data concerned in such process (i.e. name, address, email, etc.)
- (iv) description of third party engaged in the process of disclosure

## **4.8 Transmission of Data**

Should personal data be required, for any valid reason, to be transferred to any third party and if such transmission of personal data is not provided for by a relevant legal provision, Payment Courier must take into consideration whether a vested interest of the party concerned is deemed to be thereby violated. Unless barred by compelling reasons, data (including in particular personal data) may, from time to time, be transmitted to third parties domiciled in foreign countries, including countries outside of the European Union. For such transmissions it must be ensured that an appropriate level of data protection is applicable for any operation of law.

## **4.9 Confidentiality**

Data management shall be ultimately carried out in compliance with the confidentiality provisions set forth in Payment Courier's currently applicable General Terms and Conditions. Personal data may exclusively be handled by

personnel duly trained and authorised for that particular duty. It is strictly forbidden to collect, store, use or otherwise process personal data for any purpose other than the intended purpose stipulated hereunder, as well as to transmit, disclose or otherwise grant access to personal data through any means whatsoever.

#### **4.10 Rights of the Party Concerned**

All parties concerned in data management (i.e. Users) have the following inalienable rights:

##### *Right to be notified*

All Users are granted the right to get adequate information about the sort of personal data stored in their accounts, including their source and particular purpose, thus implying a right of access to a copy of the information comprised in their personal data. If any transmission to third parties is necessary, the party concerned shall also be notified of the identity of the receiving party.

##### *Right of rectification*

Besides their general right of access, all Users are furnished with the right to have any inaccurate, out-of-date or incomplete personal data rectified if necessary.

##### *Right of blocking*

Users of the website have the right to initiate a disabling phase of personal data when a certain degree of amendment is inclined to take place due to the currently changing status of data. Users may have a right in certain circumstances to have such personal data blocked.

##### *Right to have data erased or destroyed*

If it turns out that any measure of data management contravenes any principle or provision of data protection as stipulated hereunder (e.g. in case of data used in an unauthorised or excessive fashion) or that data is no longer up-to-date or necessary, the party concerned may request that his/her personal data be ultimately erased or destroyed. Should any legal provision prescribe Payment Courier's obligation to keep records for a longer period of time, then such data shall be temporarily disabled (blocked) instead of being erased.

### *Right to prevent processing for direct marketing*

Parties concerned have the right to prevent processing for commercial purposes, including direct marketing, market research or surveys.

### *Right to object to decisions being taken by automated means*

In the event that personal data are processed for the purpose of making automated decisions, the vested interest of all parties concerned shall be diligently guaranteed. Automated decisions which might entail adverse legal consequences on the Users' part shall not be used as based exclusively on the various means of information technology, unless the party concerned have given his/her prior written consent to such application. Parties concerned therefore have the right to object to certain forms of automated decision making.

### *Right for compensation*

Users have the right to object to any processing of personal data that is likely to cause or is causing damage or emotional distress as well as the right to claim compensation for damages caused by any breach of the underlying provisions.

## **4.11 Legal Remedies**

Claims for any infringement of data protection rights within the course of data management may be asserted by the aggrieved party by resorting to litigation before the competent court of law in accordance with the laws of England and Wales as well as by filing an official complaint with the Data Protection Supervisory Authority. Before lodging any complaints, Users are kindly required to primarily opt for amicable dispute settlement with Payment Courier.

## **5. Final Provisions**

### **5.1 Links directing to foreign websites**

Supplier's website may contain or refer to links directing to other non-related websites, or software applications. Payment Courier assumes no liability for the content and the standards of data protection of such websites.



## **5.2 Proprietary rights to information**

Payment Courier hereby represents and warrants that he maintains all rights, title and interest in and to all intellectual property in the content displayed on the website [www.paymentcourier.com](http://www.paymentcourier.com) and [www.pymnt.io](http://www.pymnt.io) duly protected by international and English law.

All rights, including copyrights, moral rights and other protected rights are reserved. Therefore, it is strictly forbidden to sell, modify or otherwise commercialise information derived from the website. In case of any copyright infringement, Payment Courier shall be ready to seek recourse before court.

## **5.3 Notices and correspondence**

In case of any questions or queries that might arise from this Privacy Policy as well as any complaints in connection with data protection, including all requests for notification, or rectification, erasing or blocking of data, Users are welcome to kindly get in touch with Payment Courier Ltd. at the following contact:

Name: Payment Courier Ltd.

Registered office: 71-75 Shelton Street, Covent Garden, London,  
United Kingdom, WC2H 9JQ

Company number: 09818102

E-mail: [office@paymentcourier.com](mailto:office@paymentcourier.com)

Data Protection Correspondent: Adam Monus

## **5.4 Legal notice**

By visiting the website [www.paymentcourier.com](http://www.paymentcourier.com) and [www.pymnt.io](http://www.pymnt.io) and/or using the services provided therein, all Users shall unequivocally and expressly agree to be bound by the individual provisions of this Privacy Policy (along with its Cookie Policy) constituting an integral part of Payment Courier's General Terms and Conditions.

Users thus hereby agree that all of their corporate data and identification data (including cookies, identification number, IP address, etc.) be duly collected, registered,

used, stored, and if the case may be, processed, disclosed and transferred (or even legally assigned) to third parties within the course of the service, for the purpose of providing the service, including the launching of new products to the market as well as creating customer database – whether directly or through authorised operators of Payment Courier subject to complying with the terms of this Policy.

By using the services all Users are deemed to have read and understood the stipulations of this Privacy Policy, and correspondingly have taken note of their legal rights guaranteed hereunder, namely the right to be notified, the right to access data, the right to object, the right to have data blocked, erased and destroyed, the right to not be subject to unilateral decision making as well as the right to address the courts and the Data Protection Supervisory Authority in case of any breach of their vested interests and rights guaranteed under the currently applicable data protection law.