

GDPR DATA PRIVACY POLICY Notice for DIRECT PAY ONLINE.

Document Control

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1. Introduction.

- 1.1 Direct Pay Online(DPO) and all its legal entities operate mainly across Africa. The company is fully compliant with GDPR and acts as both a controller and a processor, on behalf of data subjects that DPO perform processing for.

The Board of Directors and management DPO, located at 3G Direct Pay Limited, Suite #3, Ulysses House, Foley Street #1, Dublin 1, Ireland, Tel +353 1 8881005, are committed to compliance with all relevant EU and Member State laws in respect of personal data, and the protection of the "rights and freedoms" of individuals whose information DPO collects and processes in accordance with the General Data Protection Regulation (GDPR).

- 1.2 This Data Privacy Policy Notice is intended to provide transparency to data subjects about what happens with their personal data.
- 1.3 GDPR applies to the processing of personal data wholly or partly by automated means (i.e. by computer) and to the processing other than by automated means of personal data (i.e. paper records) that form part of a filing system or are intended to form part of a filing system.
- 1.4 GDPR will apply to all controllers and processors that are established in the EU (European Union) who process the personal data of data subjects, in the context of that establishment. It will also apply to controllers and processors outside of the EU that process personal data in order to offer goods and services. DPO qualifies under all these categories.

2. Which personal data are collected and processed.

- 2.1 DPO endorses and adheres to the GDPR principal of 'data minimization' whereby DPO only collects, processes or stores the minimum amount of data that it requires to provide the requested service.
- 2.2 Different data is required at different points of the service provided by DPO and is not all collected at the same time.
- 2.3 Depending on the service provided, this can include any or all the following data:
- 2.3.1 Name
 - 2.3.2 Email address
 - 2.3.3 Contact telephone number
 - 2.3.4 Delivery address
 - 2.3.5 Bank card or account details
 - 2.3.6 Passport or National ID.
 - 2.3.7 Username and password for DPO account access
 - 2.3.8 Photo
- 2.4 In certain cases DPO may require additional information for either the service provided or any other legitimate reason. In these instances DPO will always seek

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consent from the data subject, together with an explanation of why the additional information is necessary.

3. Legal basis for obtaining or requesting personal information.

- 3.1 DPO requests personal information in its capacity as a data controller and obtains personal information from controllers for processing purposes in its capacity as a data processor.
- 3.2 The legal basis for collecting personal information is primarily as follows:
 - 3.2.1 predominantly based on consent received from a data subject and on a legitimate business need to provide the data subject with the service requested;
 - 3.2.2 where DPO is under legal obligation to collect personal information;
 - 3.2.3 in order to protect the vital interests of the data subject;
 - 3.2.4 under official authority of the Data Protection Officer or to carry out processing that is in the public interest.

4. Purpose for which we collect personal information.

- 4.1 DPO is a data controller and data processor under the GDPR.
- 4.2 DPO uses personal information in a number of different ways, including but not limited to:
 - 4.2.1 providing the services requested by the data subject;
 - 4.2.2 providing the data subject or the controller with customer support inquiries;
 - 4.2.3 providing data subjects with information on new products;
 - 4.2.4 for analyse of information to establish user trends and needs;
 - 4.2.5 to communicate with the data subject on changes to services, policies, terms and conditions or other important information.
- 4.3 DPO may use on line public domain information about the data subjects in order to confirm the identity of the cardholder or for any anti-fraud purposes.

5. The Legitimate Interest Assessment for processing personal data.

This is a three part test which consists of the following questions, for which we have provided answers:

- 5.1 Q - The purpose test (identify the legitimate interest);
A- In order to meet our contractual obligation with our merchant.
- 5.2 Q - The necessity test (consider if the processing is necessary); and
A - In order to authorise the transaction payment
- 5.3 Q - The balancing test (consider the individual's interests).
A – Require certain minimum data subject information to meet the above requirements.

6. Security & quality of personal data.

- 6.1 DPO protects and secures all data in line with its PCI-DSS Level 1 compliance.
- 6.2 DPO aims at the highest standards of quality data processing, in line with our PCI-DSS Compliance and DPO will shortly be ISO27001 compliant a well.

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- 6.3 DPO records all personal information in line with its data protection impact assessment and data inventory policies. These policies are reviewed and updated at least annually.
- 6.4 Where personal data is compromised and the breach is likely to result in a high risk to the rights and freedoms of natural persons, DPO shall communicate the personal data breach to the data subject without undue delay, and as clearly and simply put as possible.
- 6.5 Where DPO has reasonable doubts concerning the identity of the natural person making a request, DPO may request the provision of additional information necessary to confirm the identity of the data subject.

7. Data Subject Rights.

- 7.1 In accordance with GDPR legislation, data subjects are provided with the following rights by DPO:
- 7.1.1 **Right of Access.** This allows the data subject the right to obtain from DPO confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data. Requests for personal data being processed by DPO should be submitted to dataprotectionofficer@directpay.online
- 7.1.2 **Right to rectification.** The data subject shall have the right to obtain from DPO without undue delay the rectification of inaccurate personal data concerning him or her.
- 7.1.3 **Right to erasure.** The data subject shall have the right to obtain from DPO the erasure of personal data concerning him or her without undue delay and the controller shall have the obligation to erase personal data without undue delay.
The right to erasure shall not apply where the personal data is required to be retained for compliance, legal, archiving or processing purposes by either the controller or the processor.
Furthermore, where the erasure proves impossible or involves disproportionate effort.
- 7.1.4 **Right to restriction of processing.** The data subject shall have the right to have a restriction 'FREEZE' placed on his personal information for further processing, and such restriction will only be lifted if consent is received from the data subject.
- 7.1.5 **Right to data portability.**
- 7.1.5.1 The data subject shall have the right to receive his/her personal data in a legible, simple and readable format from the controller, and
- 7.1.5.2 To have his/her personal information transferred to another controller.
- 7.1.6 **Right to object.** The data subject shall have the right to object to processing of his/her personal data at any time:
- 7.1.6.1 On grounds relating to his or her particular situation, concerning him or her which is based on paragraphs 3 and 4 above, and
- 7.1.6.2 Where personal data are processed for direct marketing purposes.

8. Retention of personal and other data.

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- 8.1 DPO retains personal and processing data in line with PCI-DSS standards.
- 8.2 All data that is required to be retained for compliance, legal, archiving, client support or ongoing processing is retained for only as long as is absolutely required and in line with DPO's PCI-DSS compliance, where after it is erased and disposed of.

9. Consent.

- 9.1 By the Data Subject providing consent, and being advised about this privacy policy, he is giving DPO permission to process personal data specifically for the purpose of the requested service.
- 9.2 Consent is required by DPO to proceed with the requested service and will be explicitly requested and given.

10. General information.

- 10.1 DPO have appointed a board approved Data Protection Officer to ensure the enforcement and compliance with GDPR. Any requests, complaints or communications by staff, third parties, service providers, data subject, controllers, processors or the data security authority should be directed to the following email, namely dataprotectionofficer@directpay.online
- 10.2 DPO as a controller and processor, its staff, third parties and service providers are all subject to the Data Protection Policy and this Data Privacy Policy, under the control of the Data Protection Officer.
- 10.3 Transfers of data between all parties from within the European Union and DPO operations across Africa have been approved by the DPO board, as per the DPO GDPR Transfer of Personal Data to Third Countries.
- 10.4 DPO will never sell, share or obtain personal information for any purpose whatsoever, unless it receives the data subject's consent, and that the recipient is GDPR compliant and has the appropriate security facilities in place.

11. Document Owner and Approval

The Data Protection Officer wef 7th September 2018 is Wouter Uitzinger who, in his capacity as employee of DPO, is responsible for ensuring that this policy is reviewed and updated annually as required.

A current version of this document is available to all members of staff on ZOHO.

This policy was approved by the Board of Directors on 7th September 2018, and is issued on a version controlled basis under the signature of the Chief Executive Officer (CEO).

Signature:

Date:

Change History Record

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Issue	Description of Change	Date of Issue
V1.0	Initial issue Wouter Uitzinger	31 July 2018
V1.1	Update for Board Approval Wouter Uitzinger	31 Aug 2018
V1.2	Reviewed by Shlomi Bardugo	4 Sept 2018
V1.4	Reviewed by W Uitzinger (No Changes)	9 Sept 2019