



Data Privacy Notice

In this Data Privacy Notice (“**Privacy Notice**”) we explain how we collect and use your personal data (“**Personal Data**”) that we obtain from the Merchant (as defined herein) and / or when you install, upload and use this mobile application or otherwise interact with us, how we share your Personal Data and the steps we take to protect your Personal Data, in accordance with applicable law and our standards of ethical conduct.

1. **Who we are & the application of this Privacy Notice**

In performance of the obligations under Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals, with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC (General Data Protection Regulation (the “**GDPR**”), we present in this Privacy Notice how we process your Personal Data in relation to the services provided by Euronet Polska Sp. z o.o. with its registered office in Warsaw, at ul. Inflancka 4c, 00-189 Warsaw, entered in the Register of Entrepreneurs of the National Court Register kept by the District Court for the capital city of Warsaw in Warsaw, 12th Commercial Division of the National Court Register under KRS number 0000030408; holder of taxpayer identification number (NIP) 5261030333, and holder of Business ID number (REGON) 011163179, with share capital of PLN 57,904,000 (“**EN**”, “**we**”, “**our**” or “**us**”) through the mobile application provided by EN (“**App**”) with the aim to enhance the usage of payment services consisting in the acceptance of cash in an EN’s bank note acceptor (“**BNA**”) from the Merchant and transferring this cash to the Merchant’s bank account for deposits (“**Deposit**” or “**Merchant NPA Services**”).

The Merchant NPA Services are provided by Ria Payment Institution, E.P., S.A.U., Calle Cantabria, 2, 2º, A-1, 28108 Alcobendas, Madrid, Spain, entered in the Register of Payment Institutions of the Bank of Spain (Registro Especial de Entidades de Pago del Banco de España) under the number 6842 and supervised by the Bank of Spain, or other entity belonging to Euronet Group entitled to perform the type of services (“**Provider**”) for entity being a party to the agreement with the Provider for the Merchant NPA Services (“**Merchant**”).

Both EN and the Provider are subsidiaries of Euronet Worldwide, Inc. (“**Euronet**”). Further details on Euronet and the companies within the Euronet group global network (“**Euronet Group**”) are available at: <http://www.euronetworldwide.com>.

The controller of your Personal Data is the Merchant (“**Data Controller**”), who authorized you as its employee (a natural person in an employment relationship, freelance work relationship or another relationship of similar nature with the Merchant or an entity cooperating with the Merchant) to order Deposits for and on behalf of the Merchant (“**Authorized Employee**”). This means that the Merchant is responsible for deciding how it will hold and use your Personal Data. The Merchant shall take appropriate measures to provide you with transparent information, communication and modalities for the exercise of your rights in regards to your Personal Data processing.

Personal Data is processed by EN on a basis of an agreement between the Merchant and EN, under which the Merchant, as the Data Controller, entrusted EN processing of your Personal Data on its behalf

(“**EN-Merchant Agreement**”). It means that EN is a processor of your Personal Data. The purpose of processing is to provide the Merchant with the services agreed in the EN-Merchant Agreement, in particular to enable the Authorized Employees acting on behalf of the Merchant to locate available BNAs to order the Deposit.

By using or navigating the App, you acknowledge that you have read this Privacy Notice. You should not use the App if you do not agree with the terms of this Privacy Notice. We encourage you to review and check the App regularly for any updates to this Privacy Notice.

Processing of your Personal Data by the Provider has been described in the agreement between the Provider and the Merchant and in respective Personal Data Notice(s).

2. Data Protection Principles

“Personal Data” means any information that enables us to identify you, directly or indirectly, such as name, email, address, telephone number, any form of identification number or one or more factors specific to your physical, physiological, mental, economic, cultural or social identity.

We are committed to complying with applicable data protection laws and will ensure that Personal Data is:

- Used lawfully, fairly and in a transparent way;
- Collected only for the purposes that we have clearly explained to you in this Privacy Notice and not used in any way that is incompatible with those purposes;
- Relevant to the purposes we have told you about and limited only to those purposes;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we have told you about; and
- Kept securely.

3. What Personal Data do we collect and how do we collect it?

We collect your Personal Data on behalf of the Merchant:

- from the Merchant and
- from you, when you give it to us, including when you install and download the App and when you visit the App.

Among the types of Personal Data we collect there are: your name and last name, number of an identification card issued to the Merchant and assigned to you as the Authorized Employee that enables your identification in a BNA for the purposes of ordering Deposits (the “**Card**”), approximate location permission, push notifications permission, usage data & Google maps APIs, as to present BNAs locations on maps.

Also, the App will enable us to monitor and analyze traffic and can be used to keep track of your logins. For operation and maintenance purposes, this App and any third-party services may collect files that record interaction with this App (system logs) and use other Personal Data (such as the IP Address) for this purpose.

Depending on your specific device, this App may request certain permissions that allow it to access your device data as described below:

- Approximate location permission: Used for accessing your approximate device location. This App may collect, use and share your location data in order to provide the location of the EN BNAs.
- Push notifications permission: Used for delivering service-related notifications. The App may request to send you push notifications regarding the technical availability and level of cash of BNAs you have marked as favourites in the Application.

By default, these permissions must be granted by you before the respective information can be accessed. Once the permission has been given, it can be revoked by you at any time. In order to revoke these permissions, you may refer to the device settings or contact the Data Controller for support. Please note that the revoking of such permissions might impact the proper functioning of this App. Providing by you of your Personal Data referred to above is voluntary. Not providing this data may, however, impact the proper functioning of this App.

4. How we use your Personal Data?

We use Personal Data only on behalf of the Merchant and for the purposes agreed by us with the Merchant under the EN-Merchant Agreement, in particular to enable the Merchants' Authorized Employees to locate BNAs.

5. Is your Personal Data collected shared with third parties?

We may share your personal data with entities that belong to the Euronet Group and/or other entities that provide various services in the extent agreed with the Data Controller and if it's essential or necessary to enable or facilitate us to provide the Merchant with the services agreed under EN-Merchant Agreement.

We have safeguards in place protecting your Personal Data. Some of the entities to which we may disclose your personal data, in accordance with the above provisions, may be located outside the EEA. This includes countries which, according to the European Commission, do not provide an adequate level of protection of personal data. In this case, we ensure that the transfer of your Personal Data is based on one of the mechanisms provided by law, allowing for the lawful disclosure of your personal data to a third country.

We may also disclose your personal data with entities that are entitled to request it under applicable law, including judicial authorities, as well as other public authorities within the scope of their competence.

Finally, there is the possibility that we may disclose your personal data in connection with the sale, purchase, merger or reorganization of EN or any of its assets. In such case, EN will take all appropriate measures to ensure that your data is adequately protected.

6. How long is Personal Data retained?

EN stores your personal data provided in connection with the EN-Merchant Agreement, only as long as it is reasonable for legitimate purposes of processing.

7. Data Security

We are committed to maintaining the security of your Personal Data and have measures in place to protect against the loss, misuse, and alteration of the data under our control.

We employ modern and secure techniques to protect our systems from intrusion by unauthorized individuals and we regularly upgrade our security as better methods become available.

Our datacenters and those of our partners utilize state-of-the-art physical security measures to prevent unauthorized access to the facility. In addition, all Personal Data is stored in a secure location behind firewalls and other sophisticated security systems with limited (need-to-know) administrative access.

All EN employees who have access to, or are associated with, the processing of Personal Data are contractually obligated to respect the confidentiality of your data and abide by the privacy standards we have established.

8. Does this Privacy Notice apply to other applications?

No.

- We embedded into the App Google Maps, which means that the App includes Google Maps features and content. The use of Google Maps features and content is subject to the then-current versions of the: (1) Google Maps/Google Earth Additional Terms of Service at https://maps.google.com/help/terms_maps.html; and (2) Google Privacy Policy at <https://www.google.com/policies/privacy/>. By using the App you agree to be bound by Google's Terms of Service (<https://www.google.com/intl/en/policies/terms>) and Google Privacy Policy.
- We embedded Firebase Cloud Messaging (FCM), which means that the App includes Firebase Cloud Messaging features, to enable delivery of push notifications. The use of Firebase Cloud Messaging features is subject to the then-current versions of the Privacy and Security in Firebase at <https://firebase.google.com/support/privacy>. By using the App you agree to be bound by Firebase Terms of Service (<https://firebase.google.com/terms>) and Firebase Privacy Policy.

9. What are my Personal Data protection rights?

You have various rights in connection with the processing of your Personal Data of which you should be informed by the Data Controller. For your convenience, we listed below your rights, however you must be aware that these rights can be executed only towards the Data Controller.

You have the right to access your data. This means that you can ask the Data Controller if your Personal Data are processed, what categories of your data are processed and for what purposes. You can also ask, among other things, to whom your personal data are disclosed, or how long it will be retained. You can also ask the Data Controller about the processing of your Personal Data which is associated with automated decision making.

You have the right to request rectification of your data.

You have the right to obtain from the Data Controller the restriction of processing or deletion of your Personal Data. This means that in some cases defined by law, you may request that the processing of your personal data be limited only to storage. In some cases you also have the right to request your personal data be deleted by the Data Controller.

You have the right to withdraw your consent to the processing of your Personal Data in cases where your data is processed based on the consent given.

You have the right to object to the processing that the Data Controller carries out based on its indispensability or the legitimate interests of Data Controller.

You can also object to the processing of your personal data for direct marketing purposes of the Data Controller, including profiling carried out for this purposes.

You have the right to data portability. This means that you have the right to demand that your Personal Data provided to the Data Controller and processed on the basis of your consent be issued to you in a structured, machine-readable and commonly used format. You can send this data to another controller without any obstacles on the part of the Data Controller. You can also ask the Data Controller to forward your data directly to another controller – the Data Controller will honor this request if only this is technically possible.

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

You can exercise your rights as described above by notifying the Data Controller.

10. Privacy-Related Complaints Procedure

Where you believe that we have not complied with our obligations under this Privacy Notice, or the applicable law, we advise you to notify the Data Controller. Also, you have the right to lodge a complaint with a supervisory authority.

11. Contact Us

If you have any questions or concerns about this Privacy Notice or EN's data practices, please contact our Privacy Team:

By email at: DPO@euronetworldwide.com

By post to: Euronet Polska Spółka z o.o.
GBC (Building D), 4C Inflancka Street, 00-189 Warszawa, Poland
Attn.: Data Protection Officer
or
Euronet Data Protection Officer
Calle Cantabria, nº2 – 2ª planta, 28108, Alcobendas (Madrid), Spain