

PRIVACY POLICY

Effective Date: April 8th, 2025

Last Updated Date: January 25th, 2026

This Privacy policy (hereinafter "**Privacy Policy**") together with our Terms of Service (which can be found at pinkwallet.com) sets out the basis on which any Personal Information collected from you (hereinafter referred to as "**you**", "**your**" or the "**Customer**") or provided by you to us shall be processed by Pink Technologies Inc, its other affiliated companies and/or other qualified service providers engaged by Pink Technologies Inc (hereinafter "**Pinkwallet**").

This Privacy Policy together with our Terms of Service and any other Pinkwallet agreements will apply to your use of:

- our website at pinkwallet.com (the "Site");
- our currency management software (mobile Wallet application ("Wallet"), once you have downloaded a copy of the Wallet onto your mobile device or hand-held device;

and

- any of our other services available via our Site or Wallet (our "Services")
- and sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed and used by us.

If you have any questions about your personal information or this Privacy policy, please direct your questions to support@pinkwallet.com

We will collect and process the following data about you Information you provide to us,

"**Submitted Information**" is information you give us about yourself by completing forms on the Wallet and/or the Site, or by corresponding with us i.e. by e-mail. It includes information you provide when you register to use the Wallet, download the Wallet, subscribe to any of our Services, enter into any transaction on the Wallet or the Site, enter a competition, promotion or survey and when you report a problem with either the Wallet, the Services or the Site. If you contact us, we will keep a record of that correspondence. The information you give us may include your name, address, date of birth, e-mail address, phone number, the device's phone number, username, password and other registration information. It may include financial information, details of your bank Wallet including the bank Wallet number, bank sort code, IBAN, details of your debit and credit cards including the long number, relevant expiry dates, CVC, identification document numbers, copies of identification

documents (for example, passport details, driving license and utility bills) personal description, photographs and any other information you provide us in order to prove your eligibility to use our Services.

Information we collect about you and your device. Each time you visit the Wallet or our Site we will automatically collect the following information:

- technical information, including the internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, device information and the type of mobile device you use, a unique device identifier (for example, your device's IMEI number, the MAC address of the device's wireless network interface, or the mobile phone number used by the device), mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting "Device Information";
- information about your visit, including the full uniform resource locators (URL), clickstream to, through and from our Site (including date and time), services 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), methods used to browse away from the page, device information;
- transaction information including date, time, amount, currencies used, exchange rate, beneficiary details, details and location of the merchant or ATMs associated with the transaction, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, device information used to facilitate the payment and the payment instrument used;
- information stored on your device, including if you allow Pinkwallet to access contact information from your address book, login information, photos, videos or other digital content, check ins (Content Information). The Wallet will periodically recollect this information in order to stay up-to-date;
- details of your use of our Wallet or your visits to our Site including transaction details relating to your use of our Services, including who you have sent money or electronic money to, foreign exchange transactions you have entered into, the time, date and location of the place the transaction was entered into;
- location information; we use GPS technology and your IP address to determine your location. This is used to prevent fraud, for instance if your mobile phone is saying that you are based in the UK but your card is being used to enter into an ATM Withdrawal or point of sale purchase in Germany, we may not allow that transaction to be processed. Our card protection and fraud-prevention measures require this personal data for the feature to work. If you wish to use the particular feature, you

will be asked to consent to your data being used for this purpose. You can withdraw your consent at any time by disabling location permission for the Wallet within your device settings; and

- information to help us deliver our Service to you. We work closely with third parties in order to help us deliver our Services to you. These third parties are business partners (such as those we partner with to offer additional Pinkwallet Services), sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies, fraud prevention agencies, customer service providers and developers. Information we may collect about you from such parties can include credit search information, information which helps us to verify your identity or information relating to your payment transactions.

USES MADE OF THE INFORMATION

Below is a summary of the key types of data that we make use of as part of the Services.

We use information held about you in the following ways:

Submitted Information

We will use this information:

- to carry out our obligations arising from any transactions you enter into with us, i.e. top ups, transfers, ATM withdrawals, card purchases and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about; to provide you, or permit selected third parties to provide you, with information about goods or services we feel may be of interest you;
- to verify your identity to protect against fraud, comply with financial crime laws and to confirm your eligibility to use our products and Services; to notify you about changes to our service; and
- to ensure that content from our Site is presented in the most effective manner for you and for your computer.

Device Information

We will use this information:

- to administer our Site and the Wallet for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Site and the Wallet to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our Services, when you choose to do so;
- as part of our efforts to keep our Site and the Wallet safe and secure; to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you about goods or services that may interest you;
- to verify your identity, protect against fraud, comply with anti-financial crime laws and to confirm your eligibility to use our products and services; and
- to comply with our legal and regulatory obligations.

Location Information

We will use this information:

- to deliver relevant advertising to you, for example, information on nearby merchants; and
- to protect against fraud.

Third Party Information

We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information:

- to help us better understand your financial circumstances and behaviour so that we may make decisions about how we manage your Pinkwallet Wallet;
- to process Walletications for products and services available through us ; and
- for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

We will disclose the data we collect from you to certain third parties who use personal data in delivering their services to us, they use data securely and confidentially and under strict contractual controls in accordance with data protection laws and controls enforced by Pinkwallet.

We send personal data to the following sets of data processors in order to perform the Pinkwallet Services:

- **Fraud prevention agencies, including sumsub.** This is in order to verify your identity, protect against fraud, comply with anti-money laundering laws and to confirm your eligibility to use our products and services. Please note that if fraud is detected, you could be refused our Services;
- **Cloud storage providers.** This is in order to safely and securely store your data with Pinkwallet;
- **Banking and financial services partners.** Financial services providers that help us provide the Services including banking partners, banking intermediaries and international payments services providers;
- **Credit reference agencies.** For the purpose of assessing your credit score; Card manufacturing/personalization and delivery companies. For the purpose of creating your personalized Pinkwallet card and delivering this to you at your requested address; and
- **Advertisers and analytics providers.** If we decide to engage advertisers to promote our products and services, the advertisers and their advertising networks may require anonymized personal data to serve relevant adverts to you and others. We will never disclose identifiable information about individuals to advertisers, but we may provide them with aggregate information about our users. We may also use such aggregate information to help our advertising partners provide a tailored and targeted campaign, relevant for a sub-section of our users. In some instances, we may use personal data we have collected from you to enable our advertising partners to display their advertisement to their target audience. We also use analytics and search engine providers that assist us in the improvement and optimization of our Site.
- **Companies within the Pinkwallet Group and/or affiliates.** In order to provide a unified service across all of our products and services, we may disclose your personal

information to any member of the Pinkwallet Group and/or affiliates, which means any of our subsidiaries or related entities. Companies in the Pinkwallet Group will be acting as joint controllers or processors in order to provide the Services.

We may also disclose your personal information in the following circumstances:

- if we or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligations or request;
if we need to enforce or Walletly the ToS or any other agreements between you and us or to investigate potential breaches; or
- protect the rights, property or safety of Pinkwallet, our customers or others.

This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

STORAGE SECURITY & INTERNATIONAL TRANSFERS

We will need to process your personal data in order for us, for example, to action a request made by you to execute an international payment, process your payment details, provide global anti-money laundering and counter terrorist financing solutions and provide ongoing support services. We will take all steps to ensure that your data is treated securely and in accordance with this Privacy Policy.

All information you provide to us is stored on our secure servers. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted using Secured Sockets Layer technology or a secure virtual private network. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Wallet and/or our Site, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Wallet or our Site; 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.

Any third party that receives or has access to your data is required to protect such data. We shall ensure any such third party is aware of our obligations under this Privacy Policy and ensure we enter into contracts with such third parties, bound by terms no less protective than the obligations we undertake to you under this Privacy

Policy or which are imposed on us under Wallet applicable data protection laws.

You acknowledge that by using our Services You will be providing us with your data. You consent to us disclosing that information where required by this Privacy Policy and/or law.

RETENTION

Your data will be retained as long as it is necessary for us to do so, having regard to the purposes described in this Privacy Policy and our own legal and regulatory requirements. In accordance with our record keeping obligations we will retain Wallets and personal information for at least a period of five years after they are closed by you.

SECURITY

We have implemented security measures to ensure the confidentiality of your data and to protect your data from loss, misuse, alteration or destruction. Only authorised personnel of Pinkwallet have access to your data, and these personnel are required to treat the information as confidential. The security measures in place will, from time to time, be reviewed in line with legal and technical developments.

YOUR LEGAL RIGHTS

You have rights under data protection laws in relation to your personal data.

You have the right to:

- request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you. If you require this, then please contact us at support@pinkwallet.com;
- request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you require this, then please contact us at support@pinkwallet.com;
- request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Please note, that we may not always be able to comply with your request of erasure for specific legal reasons which will be

notified to you, if applicable, at the time of your request. Pinkwallet is under certain obligations to retain certain data for a minimum of 5 years. Please note that these retention requirements supersede any right to erasure requests under applicable data protection laws;

- to object to the processing of your personal data. This is in situations where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights. Pinkwallet is under certain obligations to process and retain certain data for compliance purposes. Please note that these requirements supersede any right to objection requests under applicable data protection laws. If you object to the processing of certain data then we may not be able to provide the Services and it is likely we will have to terminate your Wallet;

- request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- if you want us to establish the data's accuracy;

- where our use of your data is unlawful, but you do not want us to erase it;

- where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or

- you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it. Please note that any requests in relation to the restriction of the processing of your data means that we may not be able to perform the contract we have or are trying to enter into with you (including the Services). In this case, we may have to cancel your use of the Services, but we will notify you if this is the case at the time;

- request for the transfer of your personal data to you or to a third party. We will provide to you, your personal data in a structured, commonly used, machine-readable format, which you can then transfer to an Wallet or third party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. If you require this then please contact us at support@pinkwallet.com;

- request for the transfer of your personal data to you or to a third party. We will

provide to you, your personal data in a structured, commonly used, machine-readable format, which you can then transfer to a Wallet or third party. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you. If you require this then please contact us at support@pinkwallet.com; and

- withdraw your consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the Services to you. We will advise you if this is the case at the time you withdraw your consent.

WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (including the Pinkwallet Services). In this case, we may have to cancel your use of our Services, but we will notify you if this is the case at the time.

CHANGES

This Privacy Policy may be revised, modified, updated, and/or supplemented at any time and without prior notice at the sole and absolute discretion of Pinkwallet. We will make available the updated Privacy Policy on our website. All communications, transactions and dealings with us shall be subject to the latest version of this Privacy Policy in force at the time.

LINKS

There may be links from our site to other websites and resources provided by third parties. This Privacy Policy applicable to Wallet and only to our Site. We do not control those third-party websites or any of the content contained therein and you agree that we are in no way responsible or liable for any of those third-party websites.

MARKETING

We will obtain your express opt-in consent before we share your personal data with any company outside the Pinkwallet Group of companies for marketing or promotional purposes. You have the right to ask us not to process your data for marketing purposes. You can exercise Your right to prevent such processing at any time by contacting us support@pinkwallet.com

CONTACT US

If you have any questions, comments or concerns regarding our Privacy Policy and/or practices as they relate to our Services, please contact us at the following e-mail address: support@pinkwallet.com