

WEBSITE PRIVACY POLICY

This Privacy Policy ("Policy") governs the processing of personal information by Voyya and United Cash Back (UCB) AG ("We" or "Us") in accordance with the applicable data protection laws and in connection with the Website www.voyya.com and co-branded website at www.cbt.voyya.com. Your use of the Website is subject to this Policy. By using this Website, You signify Your consent to processing of Your Personal Information in accordance with this Privacy Policy.

We may amend this Policy at any time. Amended terms shall be effective immediately upon the posting of the revised Policy and any subsequent activity in relation to the Website shall be governed by such amended terms. If You do not agree with any term in this Policy, please do not use this Website.

This Agreement was last revised on 15th August 2017

You are advised to regularly check the Website for any amendments or updates.

Enquiries: support@voyya.com

HANDLING OF PERSONAL INFORMATION

CONFIDENTIALITY: We undertake that any Personal Information submitted by You via the Website is subject to an obligation of confidentiality.

PROCESSING LIMITATION: We strive to ensure that Personal Information is processed in a manner that is adequate, relevant and not excessive given the purpose of collection. The Website is not intended for persons under the age of 18, and We do not knowingly collect personally identifiable information from anyone under the age of 18.

CONSENT: You consent to Your Personal Information being (i) used to contact You (ii) used to provide You with access to the Website and the associated Website services. Such consent is effective immediately and will endure until such consent is revoked or We fail to possess a lawful purpose for the processing of such information.

COLLECTION OF PERSONAL INFORMATION: We collect information that can be used to identify You as a juristic person ("Personal Information"), such as the full name of the Organisation, email address, and business address of the Organisation. We do not collect any Personal Information unless You provide it voluntarily, including, without limitation, by filling out a contact form or survey; by requesting information; by having an account and e-mail address with us; by signing up for an e-mail newsletter; or by otherwise communicating via e-mailing us. If You do not want us to collect Personal Information about You, do not submit Your Personal Information. We do not collect Sensitive Personal Information.

USE OF PERSONAL INFORMATION: The processing of Your Personal Information by Us as Data Controllers shall include the collection, receipt, recording, organisation, collation, storage, updating or modification, retrieval, alteration, consultation, use; dissemination by means of transmission, distribution or making available in any other form; or merging, linking, as well as blocking, degradation, erasure or destruction of information.

INFORMATION DISCLOSURES: Information processed by the Website will only be disclosed in accordance with the consent provided by data subjects (website users); as required by law; and/or only to authorised

third parties. We may share Your Personal Information with authorised third parties such as service providers to Us. These include, but are not limited to email hosting service providers and customer relationship management (CRM) service providers. In particular, Voyya shares the Organisation's Personal Information with UCB, in order to ensure that user accounts can be created and Value-added Taxes can be claimed. Voyya does not permit UCB and other third parties to use Your Personal Information for any other purpose than to perform the services that Voyya has instructed them to provide. All processing is compatible with such purpose.

INFORMATION QUALITY: We seeks to ensure the quality, accuracy and confidentiality of Personal Information in its possession. You warrant that all Personal Information supplied by You is both true and correct at the time of provision. In the event of any aspect of Your Personal Information changing post submission, it is Your responsibility to immediately update Your Personal Information when logging into Your account thereby notifying Us.

ACCOUNTABILITY: You agree to indemnify and hold Us, our officers, directors, employees, agents, licensors, suppliers and members harmless from and against any claims, damages, actions and liabilities including without limitation, loss of profits, direct, indirect, incidental, special, consequential or punitive damages arising out of Our reliance on the Personal Information should Your Personal Information contain any errors or inaccuracies.

CROSS-BORDER TRANSFER: We may appoint certain agents, third parties and/or service providers, similar to UCB. In particular, the purpose of the trans-border transfer of Your Personal Information is to facilitate the value-added tax claim refunds to You. In facilitating Your value-added tax claim refunds to You, UCB or such third parties may be required to transfer Your Personal Information outside of Your country. In such instances, the applicable data protection laws will apply and You expressly consent to the trans-border flow of Your Personal Information. Where Personal Information is transferred cross border, other data protection laws may apply to the Personal Information.

SECURITY SAFEGUARDS We have undertaken reasonable technical and organisational measures to secure the integrity of Personal Information on the Website including measures to prevent loss of, damage to or unauthorised destruction of Personal Information and unlawful access to or processing of Personal Information. We will notify You should we have cause to believe that Your Personal Information may have been breached (accessed or used in an unauthorised manner). While We strive to use commercially acceptable means to protect Your Personal Information, We cannot guarantee its absolute security. The Site may contain links to other websites. We are not responsible for the privacy practices of such third party websites.

DATA SUBJECT PARTICIPATION: Should You have enquiries concerning Personal Information processed by Us, You can request a generated record that describes the Personal Information held by Us, and information about third parties, or categories of third parties who provide services to Us, who have, or have had, access to the information. You may request that We correct or delete Your Personal Information in our possession or under our control that is inaccurate, irrelevant, excessive, misleading or obtained unlawfully; or destroy

or delete any Personal Information that We no longer are authorised to retain. As a Website user, You have the right to request access, correction or deletion of Your Personal Information.

RETENTION OF INFORMATION: On receipt of instructions from You, We will destroy or delete a record of Personal Information about You that we are no longer authorised to retain. This is subject to certain exceptions such as retaining records that We are required by law to retain. We are entitled to retain de-identified information for authorised purposes i.e. reporting. In the event that You wish to revoke all consent pertaining to Your Personal Information and/or You would like Us to remove and/or delete Your Personal Information entirely, You may contact Us via email and send Your email to support@voyya.com

TRACKING: Like many site operators, We collect information that Your browser sends whenever You visit our Site ("Log Data"). This Log Data may include information such as Your computer's Internet Protocol ("IP") address, browser type, browser version, the pages of our Site that You visit, the time and date of Your visit, the time spent on those pages and other statistics. In addition, We may use third party services such as Google Analytics that collect, monitor and analyse this data.

COOKIES: Like many sites, We use "cookies" to collect information. You can instruct Your browser to refuse all cookies or to indicate when a cookie is being sent. However, if You do not accept cookies, You may not be able to use some portions of our Site.

OPENNESS: If You have any additional questions or concerns about our privacy practices, We invite You to contact Us by email and We will address Your concerns to the best of our ability.