

SHOUT 2020 LIMITED GLOBAL PRIVACY NOTICE

1. **Shout 2020 Limited** and its affiliates and agents (collectively, "**Shout**") respect your privacy. This Global Privacy Notice describes the types of personal information we collect, how we use the information, with whom we share it, and the choices you can make about our use of the information. We also describe the measures we take to protect the security of the information and how you can contact us about our privacy practices.
2. **Shout** entities responsible for the collection and use of your personal information for the purposes described in this Global Privacy Notice are indicated in the How to Contact Us section of this document.
3. Our privacy practices may vary among the locations in which we operate to reflect local practices and legal requirements.

Personal Information We Collect

4. **Shout** may obtain information about you from various sources.
5. As a facilitator and processor of payment transactions and provider of related services, we obtain an amount of personal information about you from financial institutions and other entities in connection with your payment transactions in order to meet the compliance requirements of various regulatory bodies.
6. In this context, we receive the documents you provide to meet the various compliance requirements.
7. We also may obtain information about you from companies and governmental and non-governmental regulatory bodies and from publicly available information systems.
8. In addition, you may choose to submit information directly to us via several methods, including: (i) on our website, (ii) in response to direct communications, (iii) by signing up for a **Shout** product or service, (iv) through participation in an offer, program or promotion, or (v) in connection with an actual or potential business or employment relationship with us. You may also choose to consent to third parties disclosing information about you to us that those third parties have collected.
9. The types of personal information we may obtain or you may choose to provide include:
 - a. Contact information (such as name, postal and e-mail address, and phone number).
 - b. Business contact information (such as job title, department and name of organisation).
 - c. Payment account information.
 - d. Mobile device unique identifier.
 - e. Geo-location data.
 - f. Other information (language preference, age, date of birth, gender and family status).

10. We, our service providers and partners collect certain information by using automated means, such as cookies and web beacons, or by monitoring visits to our websites, pages or other digital assets. The information we collect in this manner may include: IP address, browser type, operating system, referring URLs and information on actions taken or interaction with our digital assets. A "cookie" is a text file placed on a computer's hard drive by a web server. A "web beacon," also known as an Internet tag, pixel tag or clear GIF, is used to transmit information back to a web server.

11. We may use third-party web analytics services on our website and mobile apps, such as those of Adobe Omniture. The analytics providers that administer these services use technologies such as cookies and web beacons to help us analyse how visitors use our website.

12. Please see the "Your Rights and Choices" section of this Global Privacy Notice to learn about your ability, at any time, to opt out or limit the use of your browsing behaviour.

How We Use Personal Information We Collect

13. We may use the personal information we obtain about you to:

- a. Process your payment transactions.
- b. Protect against and prevent fraud, money laundering, unauthorised transactions, claims and other liabilities, and manage risk exposure and franchise quality with respect to the integrity and security of our payments network.
- c. Create and manage any accounts you may have with us and respond to your inquiries.
- d. Operate, evaluate and improve our business (including developing new services; managing our communications; facilitating the functionality of our website and any other digital assets; and performing accounting, auditing, billing, reconciliation and collection activities).
- e. Anonymising personal information and preparing and furnishing aggregated data reports showing anonymised information, (including, but not limited to, the following: compilations, analyses, analytical and predictive models and rules, and other aggregated reports) for the purpose of advising our issuing and acquiring institutions and other customers and partners regarding past and potential future patterns of spending, fraud, and other insights that may be extracted from this data.
- f. Enforce our other legal rights.
- g. As may be required by applicable laws and regulations or requested by any judicial process or governmental agency having or claiming jurisdiction over **Shout 2020 Limited** or **Shout's** affiliates.
- h. Comply with industry standards and our policies.

14. We also may use the information in other ways for which we provide specific notice at the time of collection.

Personal Information We Share

15. We do not sell or otherwise disclose personal information we collect about you.
16. We may share personal information we collect with our affiliates, financial institutions and other entities that process payment transactions. We share personal information to process payment transactions and perform other activities that you or third parties request. We also may share personal information with entities that assist with payment fraud prevention, to guard against money laundering, to protect payment transactions against fraud, and to ensure the security of the transaction and our payment processing system. For example, in this context we provide banks and regulatory bodies with information about our customer transactions that **Shout** process.
17. In addition, we may share personal information with other third parties with your consent. When **Shout** acts as a service provider for third parties we may provide them with personal information we collected on their behalf.
18. We also may share the information with our service providers who perform services on our behalf. We authorise these service providers to use or disclose the information only as necessary to perform services on our behalf or comply with legal requirements. We require these service providers by contract to safeguard the privacy and security of personal information they process on our behalf.
19. **Shout** transfers personal information within the **Shout** group of affiliated companies subject to the terms of this Global Privacy Notice or otherwise as we disclose to you at the time the data is collected (e.g. via service specific privacy notice).
20. On our website, you may choose to use certain features that can be accessed through, or for which we partner with, other entities that are not otherwise affiliated with **Shout**. These features, which include geo-location tools, are operated by third parties, and are clearly identified as such. These third parties may use or share personal information in accordance with their own privacy policies. We strongly suggest you review the third parties' privacy policies if you use the relevant features.
21. We may disclose information about you (i) if we are required to do so by law or legal process, (ii) when we believe disclosure is necessary to prevent harm or financial loss, or (iii) in connection with an investigation of suspected or actual fraudulent or illegal activity.
22. We reserve the right to transfer personal information we have about you in the event we sell or transfer all or a portion of our business or assets. Should such a sale or transfer occur, we will use reasonable efforts to direct the transferee to use personal information you have provided to us in a manner that is consistent with our Global Privacy Notice. Following such a sale or transfer, you may contact the entity to which we transferred your personal information with any inquiries concerning the processing of that information.

Your Rights and Choices

23. You have certain rights regarding the personal information we maintain about you.
24. You can choose not to provide personal information to **Shout** by refraining from conducting payment transactions. You also may refrain from submitting information directly to us. However, if you do not provide personal information when requested, you may not be able to benefit from the full

range of **Shout** services.

25. You can opt out of the collection and use of certain information, which we collect about you by automated means, when you visit our website. In certain jurisdictions, you can exercise your choice via the Cookie Consent tool on our website. Your browser may tell you how to be notified and opt out of receiving certain types of cookies. Please note, however, that without cookies you may not be able to use all of the features of our website or online services.

26. As indicated above, we may anonymise personal information to perform data analysis.

27. To the extent provided by applicable law, you may withdraw any consent you previously provided to us, or object at any time on legitimate grounds, to the processing of your personal information. We will apply your preferences going forward. In some circumstances, withdrawing your consent to **Shout's** use or disclosure of your personal information will mean that you cannot use **Shout** services.

28. Subject to applicable law, you may have the right to: obtain confirmation that we hold personal information about you, request access to and receive information about the personal information we maintain about you, receive copies of the personal information we maintain about you, update and correct inaccuracies in your personal information, object to the processing of your personal information, and have the information blocked, anonymised or deleted, as appropriate. The right to access personal information may be limited in some circumstances by local law requirements. To exercise these rights, please contact us as set forth below.

29. To update your preferences, ask us to remove your information or submit a request to access, update, correct or delete your personal information, please contact us as specified below.

30. If we fall short of your expectations in processing your personal information or you wish to make a complaint about our privacy practices, please tell us because it gives us an opportunity to fix the problem. You may contact us by using the contact details provided in the "How to Contact Us" section below. To assist us in responding to your request, please give full details of the issue. We attempt to review and respond to all complaints within a reasonable time.

31. If you provide us with any information or material relating to another individual, you should make sure that the sharing with us and our further use as described to you from time to time is in line with applicable laws, so for example you should duly inform that individual on the processing of her/his personal data and obtain her/his consent, as may be necessary under applicable laws.

International Data Transfers

32. We may transfer the personal information we collect about you to recipients in locations other than the location in which the information was originally collected, including the United States of America. Those locations may not have the same data protection laws as the location in which you initially provided the information. When we transfer your information to other locations, we will protect that information as described in this Global Privacy Notice or as otherwise disclosed to you at the time the data is collected (e.g. via program specific privacy notice).

33. **Shout 2020 Limited** is a global business. To offer our services, we may need to transfer your personal information among several locations, including the United States. We comply with applicable

legal requirements providing adequate safeguards for the transfer of personal information to locations outside of the European Economic Area ("EEA") or Switzerland.

How We Protect Personal Information

34. The security of your personal information is important to **Shout 2020 Limited**. We are committed to protecting the information we collect. We maintain administrative, technical and physical safeguards designed to protect the personal information you provide or we collect against accidental, unlawful or unauthorised destruction, loss, alteration, access, disclosure or use. We use SSL encryption on our website from which we transfer certain personal information.

35. **Shout 2020 Limited** and its affiliates and agents store personal information only for as long as it is necessary for the fulfilment of the purpose for which the personal information was collected, unless otherwise required or authorised by applicable law. We take measures to destroy or permanently de-identify personal information if required by law or if the personal information is no longer required for the purpose for which we collected it.

Updates to our Global Privacy Notice

36. This Global Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a prominent notice on our website to notify you of any significant changes to our Global Privacy Notice and indicate at the bottom of each page of the Notice when it was most recently updated. If we update our Global Privacy Notice, in certain circumstances, we may seek your consent.

How to Contact Us

37. If you have any questions or comments about this Global Privacy Notice, Shout's privacy practices or if you would like us to update information or preferences you provided to us you may e-mail us at:

info@getshout.co.uk;

or write to us at:

Global Privacy Officer

Global Privacy Officer & Data Protection Officer
Shout 2020 Limited
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15 Rockstone Place
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