

PRIVACY POLICY AND COOKIE POLICY

The FLIP ME LIMITED, Gibraltar and/or its affiliates and entities (collectively “FLIP ME”, “we” or “us”) values your security and privacy. Due to the exit of Gibraltar from the EU, Gibraltar has its own data protection law (the “Gibraltar Data Protection Law”). As of 1st January 2021 consists of both the Gibraltar GDPR and the Data Protection Act 2004 (the “DPA”), and may for certain types of personal data processing, be subject to laws from other jurisdictions.

As such, it is the policy of the FLIP ME to respect the privacy of our FLIP ME website services and users. In accordance with law and as applicable our Terms of Use and Terms of Service, FLIP ME collects information about you when you use or access our websites and other web-based products, information or services (collectively, the “Website Services”) as well as through other interactions and communications you have with us, all in compliance with the requirements of Gibraltar’s anti-money laundering and counter terrorist financing (AML/CTF) rules and Gibraltar GDPR (Know Your Customer rules). This online Privacy and Cookie Policy (the “Policy”) sets out the basis on which any information, including any personal data, we collect from you, or you provide to us, will be processed by FLIP ME. Each time you access or use our Services or provide us with information, by doing so you are accepting and, where possible, consenting to the practices described in this Policy.

1. Scope and Application

This Policy applies to persons (“Users”) anywhere in the world who access or use FLIP ME's Services through Website or App (hereinafter: Website Services) .

By accepting this Privacy Policy or by accessing or using FLIP ME Website Services you:

- (a) acknowledge that you have the right, capacity and authority to accept this Privacy Policy;
- (b) acknowledge that you have read and understand this Privacy Policy;
- (c) consent to the processing of your personal data by FLIP ME in accordance with this Privacy Policy. If you do not agree to this Privacy Policy, do not accept it and do not access

or use the FLIP ME Website Services. The Services are not targeted, intended or expected to be of use to children under 18 years old. Apart from providing information for specific services or purposes, as directed by FLIP ME processes, User-provided contributions of content or contact information regarding or about children are expressly prohibited.

This Policy does not apply to websites, applications or services that are not linked to this Policy or to those operated by third parties. FLIP ME is not responsible for and shall have no liability whatsoever in connection with such third party's processing of your information. We encourage you to review the privacy policies posted on those websites, applications and services.

2. Collection of Information

Information you give us

This is information you give us about you by providing information or filling in forms on any FLIP ME-owned Website Services, or by corresponding with us (for example, by telephone, e-mail or any other digital or electronic form). It includes for example information you provide when you register using the FLIP ME-provided back office and when you report a problem with the App, or any of our Website Services. If you contact us, FLIP ME will keep at least an electronic record of such correspondence, including personal information shared at that time. The personal information you give us (and/or indirectly our contractors) may include your name, address, e-mail address and phone k,sgk,gnumber, certain device information, username, password, residential building, work address, photograph, vat ID, personal documents ID and other registration and/or KYC and AML information you choose to provide ("Personal Information" or "Personal Data").

The Website Services collect and process Personal Data for specific, lawful purposes only, or for the performance of tasks carried out in the interests of the FLIP ME.

Information we collect about you and your device

Each time you use our Website Services there is a possibility that we will automatically collect the following information:

- technical information, including the type of mobile device you use, a unique device identifier (for example, mobile network information, your mobile operating system, the type of mobile browser you use, device token, device type, time zone setting (“Device Information”));
- details of your use of our Website Services or App including, but not limited to traffic data, weblogs and other communication data, and the resources that you access (“Log Information”).
- location information, if the Website Services or App uses GPS technology to determine your current location. If you wish to use the particular feature, you may be asked to consent to your data being used for this purpose. You can alter your consent and sharing selections at any time via your mobile device settings.

Other Information we may collect through your use of the Website Services: When you use any Website Services, we may collect Personal Information as well as demographic information, for example information that you submit, or that we collect, which may include, but is not limited to, post code, age/birth date, current residence, hometown, gender, username, mobile network information, your mobile operating system, the type of mobile browser you use, time zone setting, device location, IP address, SMS data, transaction information, business activities and services / distribution locations, browsing history information, searching history information, and registration history information (“Demographic Information”).

3. Use of Personal Data

We may use Personal Data which you provide to us or we collect from you to:

- Provide, maintain, and improve our Website Services, including, for example, to facilitate payments, send receipts, provide products and services you request (and send related information about them), develop new features, provide customer support to Users, authenticate users, and send administrative messages, whether information or required by applicable law;
- Perform internal administration and operations, including, for example, to prevent fraud or abuse of our Website Services; to troubleshoot software bugs and operational

problems; to conduct data analysis, testing, and research; and to monitor and analyze usage and activity trends;

- Send you communications we think will be of interest to you, including information about products, services, promotions, news, and FLIP ME events, where permissible under law and according to any other applicable laws; and to process contest, sweepstake, or other promotion entries and fulfill any related awards;
- Notify you about changes to our Website Services;
- Allow you to participate in any interactive features of our Website Services;
- Keep our Website Services safe and secure;
- Personalize and improve the Website Services, including to provide or recommend features, content, social connections, referrals, and advertisements, in accordance with your preferences.

Our service and products can be promoted via referral link in case a business entity or a person decides to be an affiliate, ambassador or partner (hereinafter: remarketer). If you visit our website for the purpose of promoting our partners Products and services, we process, in connection with such use of the website, the following information:

- your name, surname, address, telephone and email;
- communications you have sent (e.g. via email or communication forms on the website);
- whenever you make transactions through our website, further data processing procedures can take place, of which you will of course be specifically informed.

4. Processing, Storage and Transfer of Personal Data

We will take all steps reasonably necessary to ensure your data is processed fairly and lawfully, in accordance with the local law, other applicable laws and this Policy. By submitting your Personal Data (including Log, Device and / or Demographic Information), you agree to such transfer, storing or processing in order for FLIP ME to perform its functions, including but not limited to responding to enquiries you raise via the Website Services and maintaining contacts for future informational or promotional activities. Unless otherwise notified, FLIP ME does not ordinarily engage in automated decision making when processing your Personal Data.

You agree that we have the right to transfer the Personal Data described in this Policy to and from, and process and store it in Gibraltar and (where applicable or required) with processors in other countries, some of which may have less protective privacy laws than those where you reside. Where this is the case, we will take appropriate security measures to protect your Personal Data in accordance with this Policy.

To preserve the integrity of our databases, to carry out on-going Website Services on behalf of all Users, for research, analytics and statistics purposes and to ensure compliance with applicable laws and regulations, we retain Personal Data submitted by Users for a reasonable length of time unless otherwise prescribed by applicable law. FLIP ME is not responsible for the accuracy of the information you provide, and will modify or update your Personal Data in our databases upon your request, as further outlined below.

We will erase or archive from active use your Personal Data upon request, unless we are required to retain it in accordance with the AML (Anti-Money Laundering) and KYC (Know Your Customer) obligations under applicable law or other applicable laws or to perform agreed services. By accessing or using the Website Services, you do hereby represent and warrant that you understand that all information submitted by you through the Website Services or otherwise to FLIP ME may be used by FLIP ME in accordance with applicable laws and its policies.

5. Sharing of Personal Data

There are certain circumstances where we may transfer your Personal Data to employees, contractors, service providers and to other parties that may process your Personal Data for us. In those circumstances we may share and disclose Personal Data which we collect about you to third parties and legal and regulatory authorities and transfer your Personal Data as described in this Policy or as described at the time of collection or sharing, including as follows:

Through Our Website Services

We may share your Personal Data: With third parties with whom you choose to let us share your Personal Data, for example other apps or websites that integrate with our Website Services, or those with a Service with which we integrate.

Contractors and Other Service Providers:

- Consists of : With vendors, consultants, marketing and advertising partners, and other service providers who need access to such Personal Data to carry out work on our behalf or to perform a contract we enter into with them;

FLIP ME's third-party Service providers are contractually bound to protect and use your Personal Data only for the purposes for which it was disclosed, except as otherwise required or permitted by law.

Other Types of Data Sharing

We may share your Personal Data:

- With FLIP ME subsidiaries and affiliated entities;
- In response to a request for information by a competent authority or government entities if we determine that such disclosure is in accordance with, or is otherwise required by, any applicable law, regulation, or legal process;
- With law enforcement officials, government entities or authorities, or other third parties as required by applicable law;
- With third parties in connection with, or during negotiations of, any merger, sale of company assets, consolidation or restructuring, financing, or acquisition of all or a portion of our business by or into another company;
- If we otherwise notify you and you consent to the sharing;
- With third parties in an aggregated and/or anonymized form which cannot reasonably be used to identify you.

All sharing of Personal Data to all third parties aligns to the extent possible with the Gibraltar Data Protection Law, which is an internal policy that governs fair and lawful sharing of Personal Data requested by government entities within Gibraltar and elsewhere.

6. Your Rights and Choices

Marketing and Opting Out

FLIP ME supports Users' legal rights to opt-out of receiving communications from us and our partners. You have the option to ask us not to process your Personal Data for marketing purposes and to remove it from our database, to not receive future communications or to no longer receive our Website Services.

You may change your preferences at any time.

Please note that we may continue to send you transactional or service-related e-mails despite your desire to not receive promotional or marketing e-mail messages. Additionally, please note that if you elect to opt-out of receiving promotional e-mails from one of our Website Services, you may continue to receive promotional emails from our other websites, providers or other, non-affiliated marketers whose services you may have accessed via the FLIP ME Website Services.

Finally, while we may remove your individual contact information from our professional contacts database, please be aware that if such information is in a different third party's marketing directory through your request or election, you will need to request removal with such third party directly.

Access to and Correction of Your Personal Information

You have the right to access information held about you. Your right of access can be exercised in accordance with applicable laws. Any access request generally comes at no cost to you, but may, where permissible, be subject to a fee to meet any in providing you with details of the information we hold about you.

Changes to this Policy

We may change this Policy from time to time and without notice. If we make significant changes in the way we treat your Personal Data, or to the Policy, we will endeavor to provide you notice through the Website Services or by some other means, such as email. Your

continued use of the Website Services after such notice constitutes your acceptance of the changes. We encourage you to periodically review this Policy for the latest information on our privacy practices. We provide links to it through:

- The Website Services
- Referencing it in our Terms of Use
- Incorporating it into our contracts, agreements, and other documents as necessary or appropriate

7. Security Precautions

FLIP ME makes every effort to ensure that your Personal Data is secure on its system. FLIP ME has staff dedicated to maintaining our data protection and security policies, periodically reviewing them and making sure that FLIP ME employees and third party contractors and service providers are aware of our data protection and security practices. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. As a result, FLIP ME cannot warrant or guarantee the security of any Personal Data you transmit to us, and you do so at your own risk.

FLIP ME has established policies and procedures for securely managing information and protecting Personal Data against unauthorized access. We continually assess our data privacy, information management and security practices. Our strategy is to implement the following activities in the following ways:

- Establishing policies and procedures for securely managing information;
- Limiting employee access to viewing only necessary information in order to perform his or her duties;
- Protecting against unauthorized access to Personal Data by using data encryption, authentication and virus detection technology, as required;
- Requiring service providers with whom we do business to comply with relevant data privacy legal and regulatory requirements;

- Monitoring our websites through recognized online privacy and security organizations;
- Conducting background checks on employees and providing training to our employees.

To the extent permitted by applicable law, FLIP ME expressly disclaims any liability that may arise should any other third parties obtain the Personal Data you submit.

8. Cookies

A cookie is a small text file that is unique to the web browser on your computer or mobile device, which is used to retain user preferences, and enhance browsing experience ("Cookie"). FLIP ME uses Cookies to track overall site usage and enables us to provide a better user experience. We do not use Cookies to “see” other data on your computer or determine your email address.

Types of cookies we drop and the information collected using them include but are not necessarily limited to:

Essential

Google Tag Manager - helps make tag management simple, easy and reliable by allowing marketers and webmasters to deploy website tags all in one place.

Site Analytics

Google Analytics - gives website owners the digital analytics tools needed to analyse data from all touchpoints in one place, for a deeper understanding of the customer experience.

Customer Interaction

Salesforce Chat Solution - lets website owners chat with customers and give them real-time support.

Advertising

- DoubleClick - a subsidiary of Google which develops and provides Internet ad serving services.

- Twitter Advertising - enables website owners to track and measure the actions users take after viewing or engaging with ads on Twitter.
- Facebook Advertising - lets website owners measure, optimise and build audiences for advertising campaigns.
- LinkedIn Analytics – enables website owners to promote their company updates to targeted audiences on desktop, mobile, and tablet.

Most browsers accept and maintain Cookies by default. Check the ‘Help’ or ‘Settings’ menu of your browser to learn how to change your Cookie preferences. You can choose to alter Cookies settings related to the use of our Website Services, but this may limit your ability to access certain areas of the Website.

Alternatively you may wish to visit an independent source of information, www.aboutcookies.org, which contains comprehensive information on how to alter settings or delete Cookies from your computer as well as more general information about Cookies. For information on how to do this on the browser of your mobile phone you will need to refer to your handset manual or network operator for advice.

9. External Links

The Website may contain links to other websites on the Internet that are owned and operated by third parties (the "External Sites"). These links are provided solely as a convenience to you and not as an endorsement by FLIP ME of the contents of or reliability on such External Sites. You acknowledge that FLIP ME is not responsible for the availability of, or the information and content of any External Site. You should contact the site administrator or webmaster for those External Sites if you have any concerns regarding such links or the content located on such external Sites. If you decide to access linked third party websites, you do so at your own risk. FLIP ME does not accept liability, and shall not be liable to you for any loss or damage arising from or as a result of your acting upon the content of another website to which you may link from the Website Services.

Contact Us

If you have any questions, comments and requests related to this Policy, or if you have any complaints related to how FLIP ME processes your personal data, please contact the Commissioner of Data Protection's Office via email at support@flip-me.com.

FLIP ME has appointed a Data Protection Officer in accordance with Article 138 of the Data Protection Act 2004.