

TROC CIRCLE'S PRIVACY POLICY

Last updated: [04 January 2020]

Your privacy is important to us. This online privacy policy (the **Privacy Policy**) explains how we collect, share, use, and protect information when you visit our mobile application (the **Application**) or use our online services (our **Services**).

This Privacy Policy applies to the collection, use and disclosure of personal information we receive from users of "Troc Circle" and our accounts payable and accounts receivable services offered through the Application.

As you review this Privacy Policy, here are a few general principles to keep in mind:

- Our social media sites or other "Troc Circle" pages may have additional terms from this Privacy Policy about the privacy of your information. Please review the privacy policy for the specific online service you are using or page you are viewing.
- Our Services are not intended for children under 18 without parental surveillance. We do not knowingly collect personal information from children under 18 without parental consent.

Information We Collect

1. Personal Information

When you visit the Application or use our Services, we may collect personal information from or about you. In particular, we collect information you provide when you:

- fill in any forms;
- register to use the Application;
- open an account or use any of our Services;
- take part in online discussions, surveys or promotions;
- speak with a member of our customer support team (either on the phone or through the Application); or
- contact us for other reasons.

We will collect the following information:

- Your name, address, and date of birth.
- Your email address, phone number and details of the device you use (for example, your phone or tablet).
- Your username, password and other registration information.

- Details of your bank account, including the account number and IBAN.
- Details of your debit cards and credit cards, including the card number, expiry date and CVC (the last three digits of the number on the back of the card).
- Identification documents (for example, your passport), copies of any documents you have provided for identification purposes, a personal description (if you provide one), and any other information you provide to prove you are eligible to use our services.
- Records of our discussions, if you contact us or we contact you.
- Your photo or logo (only if you upload one).

2. Information from your device

Whenever you use our Application or platform, we collect the following information:

- Technical information, including the type of device you use, a unique device identifier (for example, the mobile phone number used by the device), mobile network information, your mobile operating system, the type of mobile browser you use and so on.
- Information about your visit, including the links you have clicked on, through and from our Application (including date and time), services you viewed or searched for, length of visits to certain pages, page interaction information (such as scrolling and clicks), and methods used to browse away from the page.
- Information on transactions (for example, payments into and out of your account), including the date, time, amount, messages sent or received with the payment, details of device used to arrange the payment and the payment method used.
- Information stored on your device, including if you give us access to contact information from your contact list, log-in information, photos or other digital content. We will regularly collect this information in order to stay up to date.

3. Information about your location

If you have location services in the Application switched on, we track your location using GPS technology and your IP address.

4. Other Information and Cookies

We or our third-party partners may also use cookies or other tracking technologies for various purposes, such as fraud prevention and monitoring our advertising and marketing campaign performance or to collect and store other information about your visit to, or use of, our Services to improve our Services. We may also collect information about you from additional online and offline sources including from co-branded partner sites or commercially available third-party

sources. We may later associate the usage and other information we collect online with personal information about you.

Use of Information

We use the information discussed above in a number of ways, such as:

- Processing applications and transactions;
- Verifying your identity (such as when you access your account information);
- Preventing fraud and enhancing the security of your account or our Services;
- Responding to your requests and communicating with you;
- Managing your preferences;
- Performing analytics concerning your use of our Services, including your responses to our emails and the pages and advertisements you view;
- Providing you tailored content and marketing messages;
- Operating, evaluating and improving our business (including developing new products and services; improving existing products and services; performing data analytics; and performing accounting, auditing and other internal functions);
- Complying with and enforcing applicable legal requirements, relevant industry standards, contractual obligations and our policies; and
- For any other purposes that we may specifically disclose at the time you provide or we collect your information.

We may also use data that we collect on an aggregate or anonymous basis (such that it does not identify any individual customers) for various business purposes, where permissible under applicable laws and regulations.

Linking to Third-Party Websites

Our Services may provide links to websites that are owned or operated by other companies (**Third-Party Websites**). When you use a link online to visit a third-party website, you will be subject to that website's privacy and security practices, which may differ from ours. You should familiarize yourself with the privacy policy, terms of use and security practices of the linked third-party website before providing any information on that website.

Changes to this Privacy Policy

We may update this Privacy Policy from time to time. When we do, we will let you know by appropriate means such as by posting the revised policy on this page with a new "Last Updated" date. Any changes to this Privacy Policy will become effective when posted unless indicated otherwise.

We work hard to protect your information.

- We take our responsibility to protect the privacy and confidentiality of your information, including personal information, very seriously. We hold our employees accountable for complying with relevant policies, procedures, rules and regulations concerning the privacy and confidentiality of information.

How Long We Retain Information

We will retain your information in accordance with our internal records retention and management policies and procedures, including as necessary to provide you with the Services or administer your “Troc Circle” account, or as long as necessary to comply with our legal obligations, resolve disputes, reserve our legal rights, and enforce our agreements.

We aim to collect only what we need, keep it up-to-date and remove it when we no longer need it.

- We take reasonable steps to ensure that the personal information we process is limited to what we require in connection with the purposes set out in this Online Privacy Policy; it is accurate and, where necessary, kept up to date; and it is erased or rectified without delay if it is inaccurate. From time to time, we may ask you to confirm the accuracy of your personal information.
- For some of our Services, you can review or update certain account information by sending an email to “Troc Circle” at terms@troccircle.com.
- We will retain copies in a form that permits identification for as long as we deem necessary in connection with the purposes set out in this Privacy Policy, unless applicable law requires a longer retention period. In particular, we will retain personal information for as long as it is needed to establish, exercise or defend any legal rights.

With Whom We Share Your Information With

We may share the information we collect from and about you with our affiliates and other third parties. For example, we may share your information with:

- Our third-party service providers;
- Other companies to bring you co-branded services, products or programs;
- Third parties or affiliates in connection with a corporate transaction, such as a sale, consolidation or merger of “Troc Circle”’s businesses;
- Other third parties to comply with legal requirements; to verify or enforce our terms of use, our other rights, or other applicable policies; to address fraud, security or technical issues; to respond to an emergency; or otherwise to protect the rights, property or security of our customers or third parties;

We may share anonymous or aggregated information with third parties to help deliver products, services, and content that are better tailored to the users of our Services and for other purposes.

From time to time, we enter into agreements with other companies to provide services to us, or to make services and products available to you. If these companies receive your personal information, they are required to safeguard it and only use it for those purposes we specify.

We can share your personal information with any person or entity if we have your consent to do so.

To exercise one or more of these rights or to ask a question about them, please use the contact details provided below.

We want to hear from you if you have questions by reaching out to us at terms@troccircle.com.