

NS Payment Technologies INC

Trading as Neosurf

Neosurf PIPEDA & Quebec Privacy Policy, V1.1, October 2023

“NS Payment Technologies”, “the company”, “we”, “us” or “our”, refers to NS Payment Technologies INC, a company registered in Quebec, Canada under Company Number 1176807577.

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1) Contact Details

Canadian address: 4388 Rue Saint-Denis Suite 200-237 Montreal Québec H2J2L1 Canada
Telephone Number: (+44) 01483 363 091

Individuals Rights Request Form – support@neosurf.com

This Privacy Policy supports the Quebec Private Sector Act of data protection and describes Neosurf's policies and procedures in the collection, use and disclosure of your information when you use the Neosurf website and buy its services and tells you about your privacy rights and how the law protects you. Neosurf uses your personal data to provide and improve the service. By using the service, you agree to the collection and use of information in accordance with this Privacy Policy.

2) Interpretation and Definitions

2.1) Interpretation

The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

2.2) Definitions

For the purposes of this Privacy Policy:

- "**Account**" means a unique account created for you to access Neosurf service or parts of Neosurf service.
- "**Company**" (referred to as either "Neosurf", "We", "Us" or "Neosurf" in this Agreement) refers to The Neosurf service as operated by NS Payment Technologies Inc, a company registered in France, under number 478 502 321.
- "**Country**" refers to Quebec Canada.

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- **"Cookies"** are small files that are placed on your computer, mobile device, or any other device by a website, containing the details of your browsing history on that website among its many uses.
- **"Device"** means any device that can access the service such as a computer, a cell phone, or a digital tablet.
- **"Personal Data"** is any information that relates to an identified or identifiable individual.
- **"Service"** refers to the Neosurf Website.
- **"Service Provider"** means any natural or legal person who processes the data on behalf of Neosurf. It refers to third-party companies or individuals employed by Neosurf to facilitate the Service, to provide the Service on behalf of Neosurf, to perform services related to the Service or to assist Neosurf in analysing how the Service is used.
- **"Usage Data"** refers to data collected automatically, either generated using the Service or from the Service infrastructure itself (for example, the duration of a page visit).
- **"Website"** refers to Neosurf, accessible from neosurf.com & mNeosurf.com.
- **"You"** means the individual accessing or using the Service, or Neosurf, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable.

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3) Collecting and Using your Personal Data

3.1) Types of Data Collected

Personal Data

While using the Neosurf Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. The collection of personal information by us will be limited to what is necessary for the purposes identified in this Policy. At all times we will collect personal information by fair and lawful means.

Personally identifiable information may include, but is not limited to:

1. Email address
2. First name and last name
3. Phone number
4. Address, State, Province, ZIP/Postal code, City
5. Usage Data

Usage Data

Usage Data is collected automatically when using the Service. Usage Data may include information such as your Device's Internet Protocol address (e.g., IP address), browser type, browser version, the pages of Neosurf Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When you access the Service by or through a mobile device, we may collect certain information automatically, including, but not limited to, the type of mobile device you use, your mobile device unique ID, the IP address of your mobile device, your mobile operating system, the type of mobile internet browser you use, unique device identifiers and other diagnostic data.

We may also collect information that your browser sends whenever you visit Neosurf Service or when you access the Service by or through a mobile device.

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The Neosurf process of a payment transaction initiated by an end-customer to the myNeosurf Account or from a website verifying a voucher transaction may require us to collect some personal data. This personal data is processed in a secure and encrypted manner. The data is collected by the website accepting a customer's Neosurf payment or directly by the customer entering payment details for the myNeosurf account.

Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on the Neosurf website and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track information and to improve and analyse the Neosurf website Service. The technologies we use may include:

- **Cookies or Browser Cookies.** A Cookie is a small file placed on a device. 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 parts of the Neosurf Service. Unless you have adjusted your browser setting so that it will refuse Cookies, Neosurf Service may use Cookies.
- **Web Beacons.** Certain sections of the Neosurf Service and some Neosurf emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that permit Neosurf, for example, to count users who have visited those pages or opened an email and for other related website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when you go offline, while Session Cookies are deleted as soon as you close your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**

Type: Session Cookies

Administered by: Us

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Purpose: These Cookies are essential to provide you with services available through the website and to enable you to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. Without these Cookies, the services that you have asked for cannot be provided, and we only use these Cookies to provide you with those services.

- **Cookies Policy / Notice Acceptance Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies identify if users have accepted the use of cookies on the website.

- **Functionality Cookies**

Type: Persistent Cookies

Administered by: Us

Purpose: These Cookies allow us to remember choices you make when you use the website, such as remembering your login details or language preference. The purpose of these Cookies is to provide you with a more personal experience and to avoid you having to re-enter your preferences every time you use the website.

- **Tracking and Performance Cookies**

Type: Persistent Cookies

Administered by: Third Parties

Purpose: These Cookies are used to track information about traffic to the website and how users use the website. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the

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information collected is typically linked to a pseudonymous identifier associated with the device you use to access the website. We may also use these Cookies to test new pages, features or new functionality of the website to see how Neosurf users react to them.

For more information about the cookies we use and Neosurf choices regarding cookies, please visit Neosurf Cookies Policy or the Cookies section of Neosurf Privacy Policy.

3.2) Use of Neosurf Personal Data

Neosurf may use Personal Data for the following purposes:

- **To provide and maintain the Neosurf Services**, including to monitor the usage of the Neosurf Service.
- **To manage myNeosurf Account:** to manage myNeosurf registration as a user of the Service. The Personal Data you provide can give you access to different functionalities of the Service that are available to you as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the purchase contract for the products, items, or services you have purchased or of any other contract you have with us through the Service.
- **To contact You:** To contact you by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products, or contracted services, including any security updates, when necessary or reasonable for their implementation.
- **To provide you with news**, exclusive offers, and general information about other Neosurf goods, services, and events which we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.
- **To manage Neosurf requests:** such as notifications and messages and updates.
- **For business transfers:** We may use Neosurf information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Neosurf assets, whether as a going concern or as part of

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bankruptcy, liquidation, or similar proceeding, in which Personal Data held by us are Neosurf Service users are among the assets transferred.

- **For other purposes:** We may use Neosurf information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of Neosurf promotional campaigns and to evaluate and improve the Neosurf Services, products, marketing, and the customer experience.

We may share Neosurf personal information in the following situations:

- **With Service Providers:** We may share Neosurf personal information with Service Providers to monitor and analyse the use of service, for payment processing, and to contact you.
- **For business transfers:** We may share or transfer Neosurf personal information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of Neosurf business to another company.
- **With Affiliates:** We may share Neosurf information with affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates may include Neosurf parent company and any other subsidiaries, joint venture partners or other companies that we control or that are under common control with us or that we work with.
- **With business partners:** We may share Neosurf information with Neosurf business partners to offer you certain products, services, or promotions.
- **With other users:** when you share personal information or otherwise interact in the public areas with other users on our websites, such information may be viewed by all users and may be publicly distributed outside.
- **Neosurf employees:** Access to Neosurf information is restricted to authorised employees who have a legitimate business purpose for accessing it, for example Customer Support if you contact us with a query.

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3.3) Data Subject Rights

1. **Right to be informed** - The Quebec Private Sector Act generally requires the knowledge and consent of the individual, except in certain circumstances where consent is not required.
2. **Right to access** - Individuals have a general right to obtain access to their personal information held by organisations.
3. **Right to rectification** - An individual may, if personal information concerning them is inaccurate, incomplete, or equivocal, or if collecting, disclosing, or keeping it are not authorised by law, require that the information be rectified.
4. **Right to erasure** - Under the Quebec Private Sector Act, an individual may require an organisation to:
 - cease disseminating personal information about them;
 - de-index any hyperlink that provides access to that information, if the dissemination violates the law or a court order; and
 - re-index any hyperlink that provides access to that information.
5. **Right to object/opt-out** - Individuals have the right to submit complaints to organisations, to withdraw consent (subject to some limitations), and to file complaints with the CAI.
6. **Right to data portability** - Under the Quebec Private Sector Act, an individual may request a copy of computerised personal information in the form of a written and intelligible transcript. Unless there are serious practical difficulties in doing so, computerised personal information collected from the applicant (and not information created or derived from their personal information) must, at their request, be disclosed to them in a structured, commonly used technological format. The information must also be disclosed, at the applicant's request, to any person or body authorised by law to collect such information.

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7. **Right not to be subject to automated decision-making** - Under the Quebec Private Sector Act, an organisation that uses personal information to make a decision based solely on the automated processing of such information must, at or before the time of the decision, or at the latest at the time the decision is communicated to the individual, inform the individual of the decision. Upon request, the individual must also be informed of:
- the personal information used to reach the decision;
 - the reasons and the main factors and parameters that led to the decision; and
 - the right of the person concerned to have the personal information used to make the decision corrected.

3.4) Retention of Neosurf Personal Data

Neosurf will retain Neosurf Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy.

- **Data relating to customer accounts:** for the duration of the contractual relationship, increased by 3 years for animation and prospecting purposes, without prejudice to retention obligations or limitation periods.
- **Data relating to customer contracts:** 10 years from the conclusion of the contracts.
- **Cookies:** 13 months.
- **Data relating to prospects:** 3 years from the date of collection or the last contact from the prospect.
- **Technical data:** 1 year.
- **Banking transaction data:** deleted as soon as the transaction is completed, except with the customer's express consent.
- **If the transaction is contested:** 13 months retention in archives following the date of debit.
- **Anti-money laundering:** 6 years.

We will retain and use Neosurf Personal Data to the extent necessary to comply with Neosurf legal obligations (for example, if we are required to retain Neosurf data to comply with applicable laws), resolve disputes, and enforce Neosurf legal agreements and policies.

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Neosurf will also retain Usage Data for internal analysis purposes. Usage Data is retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Neosurf Service, or we are legally obligated to retain this data for longer time periods.

3.5) Transfer of Neosurf Personal Data

Neosurf information, including Personal Data, is processed at Neosurf's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to France and maintained on computers located outside of Neosurf's country or other governmental jurisdiction where the data protection laws may differ than those from Neosurf jurisdiction.

Neosurf's consent to this Privacy Policy followed by Neosurf's submission of such information represents Neosurf's agreement to that transfer.

Neosurf will take all steps necessary to ensure that Neosurf data is treated securely and in accordance with this Privacy Policy and no transfer of Neosurf Personal Data will take place to an organisation or a country unless there are adequate controls in place including the security of Neosurf data and other personal information.

3.6) Disclosure of Neosurf Personal Data

Business Transactions

If Neosurf is involved in a merger, acquisition or asset sale, Neosurf Personal Data may be transferred. We will provide notice before Neosurf Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, Neosurf may be required to disclose Neosurf Personal Data if required to do so by law or in response to valid requests by public authorities (e.g., a government agency).

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Other legal requirements

Neosurf may disclose Neosurf Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation.
- Protect and defend the rights or property of Neosurf.
- Prevent or investigate possible wrongdoing in connection with the Service.
- Protect the personal safety of Users of the Service or the public.
- Protect against legal liability.

Security of Neosurf Personal Data

The security of Neosurf Personal Data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect Neosurf Personal Data, we cannot guarantee its absolute security.

Detailed Information on the Processing of Neosurf Personal Data

The Service Providers we use may have access to Neosurf Personal Data. These third-party vendors collect, store, use, process, and transfer information about Neosurf activity on Neosurf Service in accordance with their Privacy Policies.

Analytics

We may use third-party Service providers to monitor and analyse the use of Neosurf Service.

Children's Privacy

Neosurf Service does not address anyone under the age of 13. We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that Neosurf child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from anyone under the age of 13 without verification of parental consent, we take steps to remove that information from Neosurf servers.

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If we need to rely on consent as a legal basis for processing Neosurf information and Neosurf's country requires consent from a parent, we may require the Neosurf parent's consent before we collect and use that information.

Links to Other Websites

Neosurf Service may contain links to other websites that are not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

Changes to this Privacy Policy

We may update Neosurf Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on Neosurf Service, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

Contact Us

If you have any questions about this Privacy Policy, you can contact us:

- Simon Hinks (DPO): simon@neosurf.com
- By sending us an email: support@neosurf.com.