

This Privacy Policies (the “**Privacy Policies**”) applies to Shopflix Holdings Limited and its group of companies (“**we**” or “**us**” or “**RukiPay**”) and shows how we will Process your Personal data as Data Controllers. We are committed to the protection of your Personal Data, and our purpose is to inform you about the way we Process your Personal Data, including references to which data we Process, how, why, for how long, together with information about your rights as a Data Subject.

Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

1. DEFINITIONS

“**Data Controller**” means any person who alone or jointly with others determines the purposes and means of the Processing of Personal Data;

“**Data Subjects**” means any natural person whose personal data is processed by a controller or processor

“**Processing**” and “**Processing of Personal Data**” means any operation or set of operations which is taken in regard to personal data, whether or not it occurs by automatic means, and includes the collection, recording, organization, storage, adaptation, alteration, retrieval, gathering, use, disclosure by transmission, dissemination or otherwise making information available, alignment or combination, blocking, erasure or destruction of such data;

“**Personal Data**” means any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one or more factors specific to his physical, physiological, mental, economic, cultural or social identity;

“**Data Protection Legislation**” means all data protection or privacy laws and regulations applicable to the Processing of Personal Data, including but not limited to the (i) DPA, 2017 Cayman Islands (ii) UK GDPR of Data Protection Act 2018, (iii) DPA EU GDPR, (iv) any national data protection laws made under or pursuant to the GDPR, (v) the EU e-Privacy Directive (Directive 2002/58/EC, (vi) Brazil’s Lei Geral de Proteção (LGPD), (vii) LPDP N° 19.628, Chile, (viii) LPDP N° 25.326 Argentina, (ix) LPDP N° 18.331 Uruguay; in each case as may be amended, superseded or replaced.

“**Rukipay Group Members**” means any Rukipay subsidiary or their employees as well as Rukipay ultimate holding company and its subsidiaries or their employees.

2. PERSONAL DATA WE MAY COLLECT FROM YOU, AND WITH WHICH PURPOSE

2.1 Personal Data. You may provide us with Personal Data about you, for example when you enquire for or apply for our Services, by filling in forms on our website, subscribing to our newsletter, participating in one of our events, or by corresponding with us by phone, e-mail, or any other means of communication. Personal Data may include the following information:

- Contact Information: such as your name, email address, phone number, address, tax

information, payment details.

- **Account Information:** such as your username, password, and other authentication credentials.
- **Transaction Information:** such as details about your transactions and banking or wallet addresses.
- **Device Information:** such as your IP address, browser type, operating system, and device identifiers.
- **Usage Information:** such as your interaction with our Services, pages visited, and features used, openid.
- **Location Information:** such as your approximate location based on IP address or precise location if you enable location services.
- **Other Information:** that you choose to provide to us when using our Services.

2.2 Automatic Data Collection. Additionally, we may collect information about you through automatic means, for example by using cookies when you visit our websites. When you browse on our website, we process your IP address, Google Analytics ID, internet browser and device type, location data and your use of our website, including which pages you visited, how you got to our website, the time and length of your visit and your language preferences. We use this data for our legitimate interests of making sure our website works properly, including debugging, to be able to deliver you its content, for DDOS mitigation on our website, and improving our website and performing statistical analyses for optimizing the quality of our website. We also use this information to provide you with personal offers tailored to your needs and customizing what we show you to your preferences, with your prior consent.

2.3 Third Party Information. We would also like to inform you that we may also obtain data about you from third parties, such as credit references and fraud prevention agencies, to comply with applicable laws and regulations on money laundering prevention and crime or financing terrorism processes.

2.4 Consent. By using our services, navigating our webpage, or subscribing to newsletters or events, you expressly consent to the collection, processing, and use of your personal information in accordance with this Privacy Policy. You acknowledge that you have read and understood the terms of this Privacy Policy and agree to abide by them.

2.5 Usage and Purpose. We will collect, process and store your Personal Data to provide you with assistance on your queries, and/or to assess your application for a merchant or partner account as well as offering and providing our Services, facilitate the registry/login process, and conducting marketing research with the purpose of improving our products and services to be able to offer our tailored services. We will use this Personal Data to ensure the safety and integrity of our operations, by aiming to identify, prevent and counter illegal conduct and to comply with our legal know-your-customer and anti-money laundering obligations.

2.6 Information received from Google APIs. Additionally, Information received from Google APIs will adhere to API Services User Data Policy, including the Limited Use Requirements. Google user data information will also follow our privacy policy conditions, including the following treatment:

1. **Access:** When you choose to connect your Google account with our application, we request access to specific Google user data related to your account as email address.
2. **Usage:** We use the Google user data solely for the purpose of facilitating secure authentication

and authorization for accessing your information through our application. This data is used to verify your identity and manage access to the payment processing functionalities.

3. **Storage:** Your Google user data is securely stored and managed under our data privacy secure measures. We employ industry-standard security measures to safeguard this data from unauthorized access, disclosure, alteration, or destruction.

4. **Data Retention:** We retain your Google user data only for as long as necessary to fulfill the purposes outlined in this privacy policy or as required by law. You have the right to request the deletion of your data from our systems at any time.

5. **Consent:** By connecting your Google account with our application, you expressly consent to the collection, processing, and storage of your Google user data as described in this privacy policy.

6. **Revoking Access:** You have the option to revoke our access to your Google user data at any time through your Google account settings. This will disable our application's ability to access your information.

7. **Compliance:** We adhere to Google's policies and guidelines regarding the handling of user data, including the Google API Services User Data Policy.

2.7 Compliance. We will collect information on you to comply with national and international laws and regulations on money laundering prevention and crime or financing terrorism processes. We will use this Personal Data to ensure the safety and integrity of our operations, by aiming to identify, prevent and counter illegal conduct and to comply with our legal know-your-customer and anti-money laundering obligations.

3. NON-DISCLOSURE OF YOUR INFORMATION

3.1 We will not disclose your Personal Data to anyone except as described

3.2 We may share your Personal Data with third parties to provide you with the products we offer, including service providers, credit reference agencies and financial institutions. We may also share your Personal Data with third parties to prevent crime and reduce risk, if required to do so by law, where we deem it appropriate to do so, to respond to legal process or to protect the rights or property of Rukipay, our customers or others.

4. WHERE WE TRANSFER YOUR PERSONAL DATA AND DATA SECURITY

4.1 We are committed to secure your Personal Data therefore we have taken steps to prevent unauthorized access to your data, and we have put in place a range of technical and organizational measures to safeguard and secure the information we collect and Process from you.

4.2 Your Personal Data may be transferred to countries in which Rukipay or Rukipay Group Members do business, including to affiliates, services providers or third parties, which may be located in jurisdictions that may not have the same data protection laws as those in your country of residence or the Cayman Islands. Any transfer of your Personal Data by us or our duly authorized affiliates and/or delegates outside of the Cayman Islands shall be in accordance with the requirements in the Data Protection Law, 2017 of the Cayman Islands (the “DPL”) and the Data Protection Legislation. In such circumstances, we are responsible for ensuring that your information continues to be protected.

4.3 To protect European Union (EU) individuals Personal Data when these are transferred to countries outside of the European Economic Area (“EEA”), we have implemented appropriate safeguards. Every transfer of Personal Data is protected by a data processing agreement containing Standard Contractual Clauses. If you want to receive more information about these safeguards, you can contact us using the details below under (“Contacting us”).

4.4 We will storage Personal Data at the Amazon Web Services (AWS) located at the us-east-1b region, United States, which offers prime services under the following service level agreement: <https://aws.amazon.com/es/legal/service-level-agreement/>

5. RIGHTS AS DATA SUBJECT

5.1 We will grant all the rights regarding the Personal Data according to the applicable law. These are:

5.2 Right to access and update your account information through our Services.

5.3 Opt-out of receiving promotional communications from us.

5.4 Disable location services or manage permissions through your device settings.

5.5 Under current Data Protection Legislation, you are entitled to object to us Processing your Personal Data, including profiling. You may also ask us for an overview of your information or ask for a copy, and request us to correct or delete certain data, restrict Processing of your Personal Data

ask us to transfer some of this information to other organizations. In some cases, you may object to the Processing of your Personal Data and, where we have asked for your consent to process Personal Data, you can withdraw this consent at any time. Where we Process your Personal Data for our legitimate interests, you can contact us if you want more information about these.

5.6 There are some exceptions to these rights, however. For example, it will not be possible for us to delete your data if we are required by law to keep it or if we hold it in

connection with a contract with you. Similarly, access to your Personal Data may be refused if making the information available would reveal Personal Data about another person or if we are legally prevented from disclosing such information.

5.7 If you wish to exercise any of these rights, or you need further information on the rights granted under Data Protection Legislation, please contact us at info@rukipay.com

6. COOKIES

We use cookies and similar techniques, such as tags/beacons and javascripts, which are small text files stored on your device. Using cookies is a way for us to make sure that our website is continuously improved, meets your needs and can be used as a tool to optimize our marketing strategy. In order for us to do this, we place functional cookies to make the website function as well as marketing cookies which help us target the right people and show them advertisements. Some of these cookies track your use of our website and visits to other websites and allow us to show you advertisements when you browse other websites.

7. CONTACTING US, QUESTIONS AND COMPLAINTS

Questions, comments, requests or complaints concerning this Notice and the way we Process your Personal Data can be addressed to our Data Protection Officer, at, P.O. BOX 10008, Willow House, Cricket Square, Grand Cayman, KY1-1001, Cayman Islands and info@rukipay.com.

8. PRIVACY POLICY UPDATES

We may update this Policy from time to time by posting a revised version on our website. The revised version will be effective as of the date of posting. We highly encourage you to check the Privacy Policy and its updates.

9. DELETING YOUR ACCOUNT

If for some reason you ever want to delete your account, you can do that at any time from the option 'delete account' available within the Profile section of the application. When you delete your account, we delete your profile information and any other content you provide in your profile (such as your name, last name, password, email address, credit card and PIN) and depending on the category of user you are (i.e., Teacher, Parent, Fan Club Member or Child). Information that you have shared with others, others have shared about you, or content other users may have copied and stored, is not part of your account and may not be deleted when you delete your account.

10. CONTACT US,

If you have any questions about this Policy or our data practices, please contact us at info@rukipay.com