

PRIVACY POLICY

1. SCOPE

This policy applies to personal information collected on websites owned or controlled by SP Neoteric Elite Ltd and its affiliates and their brands.

The aim of this policy is to tell you how we will use any personal information we collect or you provide through our websites. Please read it carefully before you proceed. The data controller in respect of this website is SP Neoteric Elite Ltd.

2. WHAT PERSONAL INFORMATION DO WE COLLECT?

By using this Website you are agreeing to the use of your information as described in this Privacy Statement.

We encourage visitors to review each of these other website's privacy statements before disclosing any personal information. This Privacy Statement may be supplemented or amended from time to time by privacy statements that are specific to certain areas of this Website (e.g., recruitment). For more detail about the online recruitment or any other process, please review the specific statement governing that area. If you have any questions regarding this Privacy Statement, please contact webmaster services using the contact us link.

Information collection:

As a visitor, you do not have to submit any personal information in order to use the Website. This Website only collects personal information that is specifically and voluntarily provided by visitors. We collect and use several types of information the individuals we co-operate with, including information by which you may be personally identified and that is defined as personal data or personally identifiable information under applicable law ("Personal Information"), such as your first and last name, current job title, company address e-mail address, billing information, demographics, telephone number, or other (online) contact information, personal details, health related information.

We may also store and maintain any content that you provide, including but not limited to postings on any blogs, forums, wikis and other social media applications and services that we may provide.

Moreover categories of Personal Information we collect and use on through our Website, include the Information that you provide by filling in forms, in particular at the time of first contact with us, Personal Information when you enter a contest or promotion sponsored by us, and when you report a problem with our Website, Records and copies of your correspondence (including e-mail addresses), if you contact us and Details of transactions you carry out, if any, and of the fulfilment of your orders.

We do not usually seek sensitive information (e.g., data relating to race or ethnic origin, religious beliefs, criminal record, physical or mental health, or sexual orientation) from visitors. We will, where necessary, obtain your explicit consent to collect and use such information.

3. HOW WILL YOUR PERSONAL INFORMATION BE USED AND SHARED?

The personal information we collect allows us to:

- verify your identity and details of your interest and provision of services such as providing information, products and services requested from us;
- administer our website and provide customer services and support with notices of all types;

- advertising following explicit consent to communicate with you about services, products that may be of interest to you;
- meet legal, regulatory and compliance requirements;
- monitor and analyse the use of any account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime;
- investigate any complaints about this website;
- personalise your experience of this website; and

At times, you may provide personal information via this site, for example, to gain access to specific content, attend a hosted event, respond to a survey, or request communications about specific areas of interest. In such cases, the information you submit will be used to manage your request and to customize and improve this Website and related services offered to you. We may also use your personal information for marketing purposes, or to send you promotional materials or communications regarding services provided by entities within SP Neoteric Elite Ltd Network that we feel may be of interest to you. We may also contact you to seek feedback on services provided by entities within the SP Neoteric Elite Ltd's Network or for market or other research purposes.

Your personal information may also be used to protect our rights or property and that of our users and, where appropriate, to comply with legal process. You may at any time request that we discontinue sending you emails or other communications generated in response to your provision of personal information via this Website.

In fact, we will control and be responsible for the use of your information and ensure its safety. We comply with the GDPR law, which has come into effect 25th of May, 2018.

We may use aggregated information so we can administer and improve our website, analyse trends, gather broad demographic information and detect suspicious or fraudulent transactions.

Please email us on info@neo-payments.com if you want to have details of the fraud prevention agency to whom we pass information about you. You have a legal right to these details.

4. DATA SECURITY - GENERAL DATA PRIVACY POLICY REGULATION (GDPR)

Our company's commitment to data security:

We implement a variety of administrative, managerial, and technical security measures to help protect your personal information. Our Company has various internal control standards which relate specifically to the handling of personal information. These include certain controls to help safeguard the information we collect online. Our employees are trained to understand and comply with these controls and we communicate our Privacy Policy, practices and guidelines to our employees. However, while we strive to protect your personal information, you must also take steps to protect your information. We urge you to take every precaution to protect your personal information while you are on the Internet.

Services and the website we sponsor have security measures in place to protect the loss, misuse, and alteration of the information under our control. While we make every effort to ensure the integrity and security of our network and systems, we cannot guarantee that our security measures will prevent third-party "hackers" from illegally obtaining this information. If we do discover a security breach affecting your data, every effort will be made to provide a notification within 72 hours of our team learning of the occurrence.

The GDPR took effect on May 25, 2018, and is intended to protect the data of European Union (EU) citizens. If you are a resident of the European Economic Area (EEA), or are accessing this Site from within the EEA, you have certain rights with respect to your data. We respond to all requests that we receive from individuals who wish to exercise their data protection rights in accordance with applicable data protection laws. You can contact us by sending an email to info@neo-payments.com

Rights that you may have, depending on the country in which you live, include:

- Accessing, correcting, updating, or requesting deletion of your information.

- If you request that your account be deleted, you will lose access to all of our programs and information in which you are actively registered.
- Objecting to processing of your information, asking us to restrict processing of your information, or requesting the portability of your information.
- Opting out from receiving marketing communications and newsletters of our company that we send you at any time. You can exercise this right by selecting the “unsubscribe” or “opt-out” link in the marketing and informative emails we send you. Additionally, you may update your email preferences by changing the settings in your account.
- Withdrawing your consent at any time if we have collected and processed your information with your consent. Withdrawing your consent will not affect the lawfulness of any processing that we conducted prior to your withdrawal, nor will it affect processing of your information conducted in reliance on lawful processing grounds other than consent.
- Complaining to a data protection authority about our collection and use of your information. For more information, please contact your local data protection authority. Contact details for data protection authorities in the European Union are available here.

Data Controller and Data Protection Officer

If you reside in a country in the European Economic Area or in Cyprus, then your personal data collected by Company is controlled by SP Neoteric Elite Ltd, 15B Arch. Kyprianou, 2059, Strovolos, Nicosia, Cyprus.

If you reside outside of the European Economic Area and Cyprus, then the personal data collected by Company is controlled by SP Neoteric Elite Ltd, 15B Arch. Kyprianou, 2059, Strovolos, Nicosia, Cyprus, which you can also contact by email at info@neo-payments.com.

5. CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL INFORMATION

We are committed to keeping the personal information you provide to us secure and we will take reasonable precautions to protect your personal information from loss, misuse or alteration. We do not sell your personal information for any purpose.

We have implemented information security policies, rules and technical measures to protect the personal information that we have under our control.

All of our employees and data processors (i.e. those who process your personal information on our behalf, for the purposes listed above), who have access to, and are associated with the processing of personal information, are obliged to respect the confidentiality of the personal information of all users of our Services.

6. CHILDREN’S PRIVACY PROTECTION

We understand the importance of protecting children's privacy in the interactive online world. This Website is not designed for or intentionally targeted at children 13 years of age or younger. It is not our policy to intentionally collect or maintain information about anyone under the age of 13.

7. COOKIES AND RELATED TRACKING TECHNOLOGIES

7.1 Use of Cookies on our website

We use cookies to collect information about and store your online preference and or visitation. Cookies are small pieces of information sent by a web server to a web browser which allows the server to uniquely identify the browser on each page.

We use the following categories of cookies on our website:

Functionality Cookies

These cookies remember choices you make such as the country you visit our website from, language and search parameters such as size, colour or product line. These can then be used to provide you with an experience more appropriate to your selections and to make the visits more tailored and pleasant. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

Targeting Cookies or Advertising Cookies

These cookies collect information about your browsing habits in order to make interests, enquiries and advertising more relevant to you and your interests. They are also used to limit the number of times you see an advert as well as help measure the effectiveness of an advertising campaign. The cookies are usually placed by third party advertising networks. They remember the websites you visit and that information is shared with other parties such as advertisers.

Social Media Cookies

These cookies allow you to share what you've been doing on the website on social media such as Facebook and Twitter. These cookies are not within our control. Please refer to the respective privacy policies for how their cookies work.

If you want to delete any cookies that are already on your computer, please refer to the help and support area on your internet browser for instructions on how to locate the file or directory that stores cookies.

Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our site.

7.2 Use of Web Beacons.

Some of our Web pages may contain electronic images known as Web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which including a cookie number, time and date of a page view, and a description of the page on which the Web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of a particular campaign.

8. LINKS

Our site contains links to other websites over which we have no control. We are not responsible for privacy policies or practices of other websites to which you choose to link from this site. We encourage use to review the privacy policies of those other websites so you can understand how they collect, use and share your personal information.

9. SECURITY

We have implemented reasonable technical and organisational measures designed to secure your personal information from accidental loss and from unauthorised access, use, alteration or disclosure. However, the Internet is an open system and we cannot guarantee that unauthorised third parties will never be able to defeat those measures or use your personal information for improper purposes.

10. ACCESS TO YOUR PERSONAL INFORMATION

You are entitled to see the personal information held about you. If you wish to do this, please contact us at info@neo-payments.com. We may require you to provide verification of your identity to provide a copy of the

personal information we hold. Please note that in certain circumstances we may withhold access to your personal information where we have the right to do so under current data protection legislation. Other rights you have under the GDPR law:

- Right to rectification if the data is inaccurate or incomplete
- Right to erasure - i.e. to request the deletion or removal of personal data in certain circumstances.
- Right to restrict processing - i.e. to prevent the data from being processed if it is inaccurate and in certain other circumstances.
- Right to data portability
- Right to object - i.e. you can request for us to stop the processing of your personal data for direct marketing and contractual purposes.
- The right to withdraw consent at any time.
- The right to lodge a complaint with a supervisory authority, namely ICO.

You may review, correct, update or change your personal information at any time by contacting us at info@neo-payments.com.

11. DISCLOSURE OF PERSONAL INFORMATION

In many circumstances we will not disclose personal data without consent. However when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies. Further information is available in our Information Charter about the factors we shall consider when deciding whether information should be disclosed.

We do not share your Personal Information with third parties except as indicated below:

Affiliates: We share above categories of Personal Information with our subsidiaries and affiliates to the extent this is necessary for the purposes of provision of services, customer management, customization of content, advertising (if you have consented) and security, and compliance, or to the extent you have provided your consent provided separately from this privacy policy.

Service providers: To our authorized service providers that perform certain services on our behalf, including for purposes of provision of the services you requested from us, customer management and security. These services may include fulfilling orders, processing credit card payments, risk and fraud detection and mitigation, providing customer service and marketing assistance. These service providers may have access to Personal Information needed to perform their functions but are not permitted to share or use such information for any other purposes. We have taken all reasonable steps to ensure that they comply with the current data protection regulations.

Legal successors: To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us is among the assets transferred. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this privacy policy.

Other: To the extent this is necessary to fulfill any other purpose not mentioned above for which you provided Personal Information and, if applicable, your consent separately from this privacy policy.

We also disclose your Personal Information to other third parties, including official authorities, courts, or other public bodies:

In response to a subpoena or similar investigative demand, a court order or other judicial or administrative order, or a request for cooperation from a law enforcement or other government agency; to establish or exercise our legal rights; to defend against legal claims; to comply with applicable law or cooperate with law enforcement, government or regulatory agencies; or to enforce our Website terms and conditions or other agreements or policies; or as otherwise required by law (including responding to any government or regulatory request). In such cases, we may raise or waive any legal objection or right available to us, in our sole discretion.

To the extent a disclosure is necessary in connection with efforts to investigate, prevent, report or take other action regarding illegal activity, suspected fraud or other wrongdoing; to protect and defend the rights, property or safety of our company, our users, our employees, or others; to maintain and protect the security and integrity of our Website or infrastructure.

Third parties to whom we may disclose Personal Information may have their own privacy policies which describe how they use and protect Personal Information. If you want to learn more about their privacy practices, we encourage you to visit the websites of those third parties.

We may disclose aggregated information about our users, and information that does not identify any individual, without restriction. In particular, we may transfer non-Personal Information and process it outside your country of residence, wherever the Website, its affiliates and service providers operate. We may combine non-Personal Information we collect with additional non-Personal Information collected from other sources. We also may share aggregated information with third parties, including advisors, advertisers and investors, for the purpose of conducting general business analysis.

You can also get further information on:

- agreements we have with other organisations for sharing information;
- circumstances where we can pass on personal data without consent for example, to prevent and detect crime and to produce anonymised statistics;
- our instructions to staff on how to collect, use and delete personal data; and
- how we check that the information we hold is accurate and up to date.

12. CHANGES TO OUR PRIVACY & COOKIES POLICY

If our Privacy & Cookies Policy changes in any way, we will place an updated version on this page. Regularly reviewing this page ensures that you are always aware of what personal information we collect, how we use it and under what circumstances, if any, we will share it with other parties. If we change anything in our privacy policy, the date of change will be reflected in the “last modified date”. You agree that you will periodically review this privacy policy and refresh the page when doing so. You agree to note the date of the last revision to our privacy policy. If the “last modified” date is unchanged from the last time you reviewed our privacy policy, then it is unchanged. On the other hand, if the date has changed, then there have been changes, and you agree to re-review our privacy policy, and you agree to the new ones. By continuing to use the Website subsequent to us making available an amended version of our privacy policy in a way that you can easily take notice of it, you thereby consent to such amendment.

13. CHANGES TO THIS PRIVACY NOTICE

We keep our privacy notice under regular review. This privacy notice was last updated on 25th May 2018.

14. LINKS TO OTHER WEBSITES

This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

15. HOW TO CONTACT US

If you have any questions about this statement or your personal information, please contact us at info@neo-payments.com.

I agree to the above Terms and Conditions