

Privacy Policy

INTRODUCTION

Please read this notice carefully to understand our policies and practices regarding your personal information and how we will treat it.

References to “you” in this notice are to the individual who is accessing or applying to use the Services (as defined below) either on your own account or on behalf of a business. This includes, in relation to a customer or prospective customer of Redstone, any sole trader and any principals, including the managing and financial directors, any other directors and officers, shareholders, partners and beneficial owners of a customer, as well as any member of staff accessing or using the Services on behalf of a customer.

Redstone is committed to protecting your privacy and will take all appropriate steps to ensure that your personal information is treated securely and will be collected, used, stored, and disclosed in accordance with this notice. This notice (together with our terms of use applying to any specific services you may purchase or use) applies:

- to the website/portal features and services provided to you when you visit our websites, portals, or our payment panels our clients may use on their websites;
- when you apply to use and/or use Redstone’s products and services, as well as when you request changes to the services you are using;
- to your use of software including terminals, mobile and desktop applications provided by Redstone; and
- to email, other electronic messages including SMS, telephone, web chat, website/portal and other communications between you and Redstone.

Together these are all referred to in this notice as “Services”.

INFORMATION WE MAY COLLECT FROM YOU

Personal and non-personal information

We collect and process personal and non-personal information relating to you.

Personal information is information that can be used to uniquely identify a single person, either directly or indirectly.

Redstone also collects non-personal information or may anonymize personal information in order to make it non-personal. Non-personal information is information that does not enable a specific individual to be identified, either directly or indirectly. Redstone may collect, create, store, use, and disclose such non-personal information for any reasonable business purpose. For example, Redstone may use aggregated transactional information for commercial purposes, such as trend analysis and the use of data analytics to obtain learnings and insight around payment transaction patterns and usage.

To the extent that Internet Protocol (IP) addresses (or similar identifiers) are clearly defined to be personal information under any local law, and where such local law is applicable to Services, we will manage such identifiers as personal information.

Please note that Redstone provides services to both individual consumers and businesses and this privacy notice applies to both and should be read and interpreted accordingly.

COLLECTING YOUR INFORMATION

We collect the following information through the following means:

Information you give us: we receive and store any personal information (including financial information) you provide to us including when you (or your business) inquire for or make an application for the Services; register to use and/or use any Services; upload and/or store information with us using the Services; and when you communicate with us through email,

SMS, a website or portal, or the telephone or other electronic means, e.g. in the context of contacting us about your account or transactions. Such information may reference or relate to you or your customers and includes:

- Name including first name and family name, date of birth, age, email address, billing address, username, password and/or photograph, biometric information, address, occupation, nationality and country of residence, a copy of your identification, such as your driver's license or passport, your social security number and/or other government identification or registration data;
- Card primary account number, card expiry date, CVC details (card security code), account numbers, account balances and the length of time you have maintained those accounts, bank and/or issuer details;
- Information relating to any items purchased, including the location of the purchase, the value, the time, and any feedback that is given in relation to such purchase, including travel-related personal information when you or your customer are transacting for airline tickets or other travel related services;
- Information about your use of the Services, such as information about how frequently you transact with us, your average transaction volume, account balances, and the people and merchants to whom you send money and from whom you receive money;
- Points or rewards earned or redeemed in any Loyalty scheme;
- Photos and videos taken during Redstone events you have registered for, for distribution to event participants and in our promotional materials for future events; and
- Any other information that you or your customer provide or is generated in the context of using the Services.

Information we collect about you automatically: Redstone receives and stores certain information automatically whenever you interact with Redstone, whether or not you open an account or undertake a transaction with us; for example, by way of "cookies" or similar technology. We also obtain certain information when your web browser accesses Services or advertisements and other content provided by or on behalf of Redstone on other web sites, or when clicking on emails. Collecting this information enables us to better understand the visitors and customers who use and interact with Redstone, where they come from, and how they use our services. We use this information for our analytics purposes and to improve the quality and relevance of our services for our visitors and customers. This information includes:

- Technical information, including the Internet protocol (IP) address used to connect your computer or device to the Internet, your login information, browser type and version, equipment type, time zone setting, browser plug-in types and versions, operating system platform, frequency and length of visits, and what links you click on;
- Information about your visit or whether you opened an email, including your geolocation, the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products or services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs) and methods used to browse away from the site page and any phone number used to call our customer service number.

Information collected through our applications: if you download or use mobile or desktop applications provided by Redstone, we may receive information about your location and your device or the service you are using (including where a payment transaction takes place). Some devices allow applications to access real-time location-based information (for example GPS). Our mobile and desktop apps may collect such information from your mobile device or your computer at any time while you download or use our apps, if your device has real-time location data access enabled. Where required, we will always seek to notify you if it is our intent to collect real-time location information and, also where required by law, obtain your consent. We may use such information for regulatory purposes, our own due diligence checks, fraud, and risk management, to better understand transaction patterns and to optimize your experience.

Email and Other Communications: we may receive information about you and your use of Services when we communicate with each other, including when you open messages from us and from the use of electronic identifiers (sometimes known as "device fingerprints"), for example, Internet Protocol addresses or telephone numbers.

Information from Other Sources: we may receive information about you from other sources and add it to our account information, including when you apply to use the Services. For example, we work closely with, and receive information from, third parties like business partners, banks and other financial institutions, merchants, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, government lists and databases, social media sites (including posting made by or about you or us), credit reference and fraud prevention agencies. Credit reference and fraud prevention agency use is further explained below. We may also review public

comments and opinions made on social networking sites (e.g., Facebook and Twitter) to better understand our customers and our provision and development of Services.

Information about other people: if you give us information about other people, you must have informed them in advance (for example, by giving them this privacy notice) and you must ensure you have the right to do so.

WHAT WE USE YOUR PERSONAL INFORMATION FOR

We may use and share the personal information we collect for the following purposes:

- To provide our Services to you and your business, including fulfilling Redstone's obligations to you or to financial or other institutions in connection with the Services we provide to you (and/or your business). In this context we record and track details of transactions you (and/or your customers) carry out in relation to the Services; analyze and report on your (and/or your customers') use of any Loyalty service; facilitate the collection or redemption of any points or other rewards currency in respect of any Loyalty program; notify you about important changes or developments to our website or our goods and services;
- To improve and develop our business, including without limitation to optimize our websites/portals, products, and services. This may include using information you insert into forms but do not submit to us, for example by using that information to optimize our website(s) and contacting you for customer services purposes in relation to that form. We can also use your personal information to develop and test new products and services including in our secure and controlled test environment, or occasionally in those of our suppliers;
- To manage and enforce our rights, terms of use or any other contracts with you (and/or your business), including to manage any circumstances where transactions, rewards or points are disputed; manage, investigate, and resolve complaints; or recover debt or in relation to your insolvency;
- To manage and mitigate our credit risks and terms of business. If you apply for one of our financial products, we may assess your financial position (and/or of your business), to the extent this is provided for in the applicable terms of use. This credit check will also affect any linked parties such as directors, shareholders, and principals. We can do so by receiving and sharing information from and with credit reference agencies and fraud prevention agencies. This credit check will also affect anyone with whom you have a joint account or similar financial association. If it is a joint application, and such link does not already exist, then one may be created. These links will remain until you file a "notice of disassociation" at the credit reference agencies to the extent that such disassociation is allowable. For your information, the agencies will record our inquiries which may be seen by other companies who make their own credit inquiries; and a "footprint" may be placed on your credit file, whether or not you are accepted as our customer. If you are a Director, we will seek confirmation from credit reference agencies that the residential address that you provide is the same as that held by the relevant companies' registry (where applicable). In addition, where you take services from us, we will give information on how you manage your accounts to the credit reference agencies. If you do not repay any monies in full and on time, credit reference agencies will record the outstanding debt and may share this information with other organizations that perform checks similar to ours. Records generally remain on file at such agencies for 6 years after they are closed, whether settled by you or defaulted, although the retention period may differ across different agencies and territories. If you would like further information on our use of credit reference agencies, please contact us;
- To prevent and/or detect fraud, financial crime, manage risk and to better protect ourselves, our customers, and the integrity of the financial system, it may be necessary to process and disclose sensitive personal information (sometimes known as special category personal data) including biometric data to third parties who help us in managing such risks, including identity verification. This may include software and services we use to verify your identity/age by determining whether a selfie you take matches the photo in your ID;
- To prevent, detect and prosecute fraud and other crimes and abuses of the financial system, or to assist others in doing so, including non-compliance with any terms of business and which may involve the sharing of any relevant or necessary information we have collected or inferred with third parties for such purposes. Redstone participates in anti-fraud initiatives, which involve assessing you (and/or your customers) and monitoring your transactions and/or locations, to detect patterns requiring investigations or otherwise profile and assess the likelihood of fraud occurring or non-compliance with our or other's terms of business. We can do so utilizing products and services from third parties. Besides, if you give us false or inaccurate information about you, or we identify or suspect a fraud or a crime, we may pass your information to fraud prevention agencies and organizations and to law enforcement agencies and similar bodies, and we may decide to take legal action against you;
- To contact you about your account, to alert you to potential problems, and to respond to your questions to us;

- To manage risks, such as credit and foreign exchange risks, as well as to prevent or mitigate information security risk;
- To send marketing messages, to provide you with the information on products and services you have requested, or we think may be of interest to you; to obtain your views on our goods, services, and our website/s; in respect of marketing, market research and similar activities, we may use your personal information for such purposes whether or not you are accepted as a customer or continue to receive Services. If you no longer wish to receive marketing or promotional information from Redstone, you can always stop it. You can find more information on this in the section on “Your Data Protection Rights”;
- To comply with local and national laws;
- To comply with requests from law enforcement and regulatory authorities on public interest grounds or from commercial organizations with whom you have or have had dealings, to establish, exercise or defend legal claims, or to protect your vital interests or those of other persons, for example to help those authorities or other organizations in the fight against crime and terrorism; and
- To comply with card scheme rules or any terms of business.

If you provide information to be published or displayed on public areas of the website/portal or transmitted to other users of the website/portal or third parties, you understand that such information can be used by any third parties accessing the information for any purposes. This information is posted by you at your own risk, and you must comply with the terms of use of such site.

DISCLOSURE OF YOUR INFORMATION

We do not disclose information which could identify you personally, to anyone except as described in this notice, as permitted, or required by law, and/or for the purposes described in this notice, including:

- Within Redstone to help us provide our services and for our own internal customer relationship management, analytical and reporting purposes;
- To recipients/senders of a payment in the context of the specific relevant transaction (generally information is limited to full name and email address);
- Credit reference agencies (where permitted under any terms of use or other contract) as described above. If you would like further information on how we use credit reference agencies, please contact us;
- Fraud prevention agencies as described above who assist us in managing fraud and business risk;
- Third-Party Credit and Financial Institutions (where allowed under any terms of use or other contract), including the credit institution where the sender or recipient (and their businesses, respectively) maintain their bank account(s) and the card schemes governing the issue and use of credit, debit, charge, purchase or other payment cards, alternative payment schemes and any other financial institutions who may process payments and who are not operating under Redstone’s control nor for whose actions or omissions Redstone has liability;
- Where we provide services through third parties such as Banks and other organizations, we may be required to disclose your information (including any ‘know your customer’ and ‘source of wealth’ information) with such organizations in order to assist their own regulatory obligations or risk assessments;
- Third Party Service Providers, including suppliers who assist us with the provision of Services, including processing orders, fulfilling orders, processing payments, managing credit, security, sector and fraud risk, identity verification, and marketing, market research and survey activities carried out on behalf of Redstone. Occasionally, we may utilize the services of third-party providers to assist with the provision of services that might require the use of your personal information, including for the purposes of live data testing and to which suitable security arrangements will be implemented;
- To third parties who do not act under our instructions as a service provider (but will be subject to their own legal obligations to keep data secure), in order to facilitate provision of the Services. For example, banks and organizations who facilitate the trading of your stocks, crypto currencies, and other financial instruments;
- In order to prevent and/or detect fraud, financial crime, manage risk and to better protect ourselves and our customers, it may be necessary to process and disclose sensitive personal information (sometimes known as special category personal data) to third parties who help us in managing such risks, including identity verification;
- Where we are required or permitted to do so by law, Redstone may be required by law to pass information about you to regulatory authorities and law enforcement bodies worldwide, or we may otherwise determine that it is appropriate or necessary to do so. Such disclosures may also include requests from governmental or public

authorities, or with commercial organizations with whom you may have had dealings and who are seeking to mitigate fraud or credit risk, or non-compliance with terms of business, or for the purposes of litigation or legal process, national security or where we deem it in the national or public interest or otherwise lawful to do so. Redstone will not ordinarily challenge the serving of court or similar orders requiring disclosure;

- Business transfers. Redstone may buy or sell business units or affiliates. In such circumstances, we may transfer or receive customer information as a business asset. Without limiting the foregoing, if our business enters into a joint venture with or is sold to or merged with another business entity, your information may be disclosed to our new business partners or owners. In these circumstances we will inform the recipient that your information should be treated in accordance with the standards described in this notice; and
- With your permission, your information may also be used for other purposes for which you give your specific permission.

Except as necessary for the performance of its services and as described above/attached, Redstone does not sell, rent, share or otherwise disclose personal information about its customers to third parties for their own third-party marketing use without meeting any necessary legal obligations (e.g., consent, opt-out, or as otherwise permitted by law).

MONITORING

We may monitor or record telephone calls, emails, web chat or other communications with you for regulatory, security, quality assurance or training purposes. When visiting our offices, CCTV, access control systems and/or other monitoring systems may be in operation for security reasons and for health and safety and office management purposes.

HOW WE KEEP YOUR PERSONAL INFORMATION SECURE

We have implemented technical, physical, and organizational/administrative measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure. These measures include:

- Written information security program;
- Continuous vulnerability assessment and monitoring;
- Having information security risk management policies and procedures in place;
- Having an established incident response plan;
- Access controls on information systems, designed to authenticate users and permit access only to authorized individuals;
- Restricting access to physical locations containing personal information only to authorized individuals;
- Securing all personal information, both in transit and at rest;
- Multifactor authentication for all staff accessing personal information;
- Maintaining audit trails relating to internal and external access to and modifications of personal information;
- Adopted secure development practices for in-house developed applications;
- Performing information security due diligence on third-party service providers;
- Performing security awareness training on a regular basis.
- The safety and security of your information is also dependent upon you. If we have given you (or if you have chosen) a password or access code for access to certain parts of our website/portal or mobile applications and similar, you are responsible for keeping this password and/or access code confidential. You must not share your password and/or access code with anyone. You must ensure that there is no unauthorized use of your password and access code. Redstone will act upon instructions and information received from any person that enters your user id and password and you understand that you are fully responsible for all use and any actions that may take place during the use of your account, unless otherwise mandated by law. You must promptly notify Redstone of any information you have provided to us which has changed.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal information, we cannot guarantee the security of your information transmitted to our site, unless you are communicating with us through a secure channel that we have provided. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

HOW LONG WE RETAIN YOUR PERSONAL INFORMATION

The periods for which we retain your personal information are determined based on the nature and type of information, the Redstone Service, and the country in which they are provided as well as any applicable local legal or regulatory provisions. In general, once no longer needed for a legitimate business purpose or reason, your information will be deleted, or we may anonymize or aggregate it with other information to make it non-personal.

If you use the Services, we will retain your personal information as long as necessary to provide you with the services of your choice and any linked legitimate business purpose. That would generally mean we retain your personal information as long as you are our customer (or commence such an application) and for a period of time afterwards. This will also include the use and retention of your personal information when you commence completion of an application for Services, irrespective of whether you complete such application process or are accepted as a customer.

We will retain personal information as evidence of our dealings with you (including whether there were any or no financial transactions), to manage any queries or disputes, including to defend or initiate any legal claims. For example, we will retain your information for the time allowed by the local laws to start a legal claim (so called “statute of limitation”), or for as long as we are ordered pursuant to an order from the courts, or by law enforcement agencies or our regulators; or as otherwise required or permitted by law.

We can also continue marketing and sending you direct marketing, subject to local laws and where you have not objected to such marketing.

YOUR DATA PROTECTION RIGHTS

You have many rights that you may be able to exercise in relation to your personal information. If you wish you can access, correct, or update your personal information. In certain circumstances, you can also ask us to delete your personal information, object to its processing or temporarily restrict its processing while exercising your other rights. In addition, you can request to transfer certain of your personal information to another service provider (so called, data portability). You may also have the right to “opt out” of certain uses of your personal information, including asking us to limit the sharing of your personal information with affiliated and non-affiliated third parties. Privacy laws continue to develop and if you think or are unsure as to whether any right may apply to you, please also contact us, so we can assess and advise.

When you give us consent to use your personal information, you can withdraw it any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. For example, you can stop any marketing communication we send you by clicking on the “unsubscribe” or “opt-out” link in the communications you receive, or according to the instructions that we provide every time, but we will continue to send you operational or service messages in relation to your Services.

There might be cases where these rights cannot be enforced: for example, you cannot object to us using your information when it is required by law, or to manage a complaint; similarly you cannot ask us to delete your information if you want to continue using our Services or where such information is necessary to record our contractual dealings, required by law (for example, the retention of anti-fraud or “know your customer” identify and verification requirements), or for the purpose of defending or asserting legal rights and legal actions.

You always have the right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority. Also, you can commence a court action to claim compensation for damage or distress caused by our failure to comply with data protection legislation.

If you want to know more about your rights, or you want to exercise them, you can reach us at the details provided in the Contact Us section.

LEGAL BASIS FOR PROCESSING

Redstone will only process your personal information in compliance with the law. Such laws vary across different territories and further specific information is available on request. In general, Redstone will either process:

- On the basis of your consent, for example to send you marketing messages about products and services in accordance with your interests and preferences, where such consent is required by law;
- Where necessary for the performance of, or entry into, any contract we have with you, for example, in order to provide you with the Services you have subscribed – in that context, we need that information because otherwise we would not be able to provide the Services to you. For example, if we are required to verify your identity and you do not supply us with the relevant information, we may be unable to open an account for you;
- Where Redstone has a legitimate interest to process data, subject to such processing not overriding your own rights and freedoms in objecting to such processing. For example, to keep you informed about your use of the Services, improve, and develop the Services, conduct online advertising or other marketing activities, as well as manage and enforce any claim;
- Where Redstone has a legal obligation to collect, use and/or disclose your personal information or otherwise needs your personal information to protect your vital interests or those of another person. For example, when necessary to comply with the rules imposed by our or other applicable regulators; or
- Exceptionally, we may share your information with a third party, when necessary, in the public interest, for example, when law enforcement agencies or other third parties with whom you may have had dealings request information to investigate a crime or otherwise a breach of third-party terms of business.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information for any specific processing activity, please contact us via the Contact Us section below.

DO NOT TRACK

Some web browsers may send out “do not track” signals. However, there is no industry standard currently in place as to what websites and other online services should do on receipt of such signals. Should such a standard be developed, we will re-visit our policy, but currently we take no action on receipt of such signals.

CHANGES TO OUR PRIVACY NOTICE

We may, from time to time, change our privacy notice. If we make material changes to how we treat your information, we will notify you through a notice on this website/portal. The date the privacy notice was last modified is stated on this notice. Please ensure you periodically visit our website/portal and this privacy notice to check for any changes. However, if we are required by law to give you advance notice of any changes to this privacy notice and/or seek your consent to changes in our uses of your personal information, then we will do so.

LINKS TO THIRD PARTY SITES

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow such a link, please note that these websites have their own privacy and cookies policies, and Redstone does not accept any responsibility or liability for these third-party websites.

GLOBAL NOTICE

This notice is global in scope but is not intended to override any legal rights or prohibitions in any territory where such rights or prohibitions prevail. In such event, the rights and obligations set out in this notice will apply, subject only to amendment under any applicable local law having precedence.

CONTACT US

All comments, queries and requests relating to our use of your information are welcomed. If you wish to exercise any of your rights or receive further information, you should write to the address below.

Redstone Payment Solutions
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