

# Privacy Policy

## OUR COMMITMENT TO PRIVACY

LT PAYMENTS PTE. LTD. ("UNITPAY", "we", "us", "our") knows that you care about how your personal information is used and shared, and we take your privacy seriously. Our primary goal is to provide you with exceptional service, and we understand that you may have questions or concerns regarding your personal information and how it will be used. To make this privacy policy easy to find, we make it available from home page of our website at <http://unitpay.net/en.php> (the "website") and through our mobile applications. You may also email us with any privacy related questions you have.

## APPLICABILITY OF PRIVACY POLICY

This privacy policy applies to all information we collect through our web and mobile applications from UNITPAY users, including you. This policy does not apply to the practices of companies that UNITPAY does not own or control, or to individuals that UNITPAY does not employ or manage.

Throughout this policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been anonymized so that it does not identify a specific user. By submitting your personal data to UNITPAY for the use of services and purposes outlined in this policy, you are hereby giving consent for the collection, use and disclosure of the personal data that has been submitted.

## THE INFORMATION WE COLLECT

When you visit the website or use one of our mobile applications, we collect your IP address, and standard web log information, such as your browser type and the pages you accessed on our website. We also may collect certain geolocation information. If you do not agree to our collection of this information, you may not be able to use our Service.

If you open an account, we collect the following information from you:

- Account Information – text-enabled cellular/wireless telephone number, machine or mobile device ID and other similar information.
- Identification Information – your name, street address, email address, date of birth, and SSN (or other governmental issued verification numbers).
- Device Information.
- We also may obtain information about you: (a) from your mobile device such as your device type, machine or mobile device identification number, geo-location, time zone, language setting, browser type, and IP address, and (b) from third parties for purposes of transaction processing, identity verification, fraud detection or prevention and other similar purposes. For fraud prevention purposes, we also may link your machine ID with the machines of others who use your same payment cards.

## LT PAYMENTS PTE. LTD.

- Social Web Information – including but not limited to your Facebook connect credentials (and information that you authorize Facebook share with us through permissions like this <http://developers.facebook.com/images/devsite/auth-dialog-example.png> and email account information. If you authorize Facebook Connect, the plug in allows us access to your friends' contact information. We also allow you to import data from other social web services, including but not limited to Twitter, FourSquare, and email service providers. Social and e-mail contact information helps you connect to friends and contacts for invitation and payment transmission purposes (as well as helping us improve our services and fight fraud).
- Financial Information – bank account and routing numbers and credit cards linked to your UNITPAY account. UNITPAY does not share financial information with third party social networking services such as those listed in the prior bullet.

We are committed to providing a safe, secure and all around great service. Therefore, before permitting you to use our service, we may require additional information from you we can use to verify your identity, address or other information or to manage risk and compliance throughout our relationship. We may also obtain information about you from third parties such as identity verification, fraud prevention and similar services.

When you are using our Service, we collect information about your account transactions and trust relationships and we may collect information about your computer or other access device for fraud prevention and other similar purposes.

Finally, we may collect additional information from or about you in other ways not specifically described here. For example, we may collect information related to your contact with our customer support team or store results when you respond to a survey.

### **INFORMATION FROM CHILDREN**

We do not knowingly solicit or collect information from any individuals under the age of 18.

### **HOW WE USE COOKIES**

When you access our website, we, or companies we hire to track how our website is used, may place small data files called "cookies" on your computer.

For example, we send a "session cookie" to your computer any time you log in to your UNITPAY account. This type of cookie helps us to recognize you if you visit multiple pages on our site during the same session, so that we don't need to ask you for your password on each page.

Users are free to decline our cookies if your browser permits, but doing so may interfere with your use of our website.

### **HOW WE PROTECT & STORE PERSONAL INFORMATION**

We store and process your personal information using third party servers located in secure data centers. This information is protected by physical, electronic and procedural safeguards in compliance with applicable Singapore regulations. We also use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our office and files, and we authorize access to personal information only for those employees who require it to fulfill their job responsibilities.

We make reasonable efforts to ensure security on our systems. Despite our efforts, we cannot guarantee that personal information may not be accessed, disclosed, altered or destroyed by

LT PAYMENTS PTE. LTD.

breach of our administrative, managerial and technical safeguards. Therefore, we urge you to take adequate precautions to protect your personal data as well, including never sharing your UNITPAY password with anyone.

If UNITPAY learns of a systems security breach, we may attempt to notify you electronically so that you can take appropriate protective steps. By using the UNITPAY service, you agree that UNITPAY may communicate with you electronically. UNITPAY may post a notice on the Website if a security breach occurs. UNITPAY may also send you an email to you at the email address you have provided to us. Depending on where you live, you may have a legal right to receive notice of a security breach in writing. To receive free written notice of a security breach (or to withdraw your consent from receiving electronic notice of a security breach) you should notify us.

## **HOW WE USE THE PERSONAL INFORMATION WE COLLECT**

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, fun and customized experience. We may use your personal information to:

- provide the services and customer support you request;
- process transactions and send notices about your transactions or your network activity;
- resolve disputes, collect fees, and troubleshoot problems;
- prevent potentially fraudulent, prohibited or illegal activities, and enforce our User Agreement;
- customize, personalize, measure, and improve our services and the content and layout of our website;
- send you updates about new products and services that we are offering to customers
- compare information for accuracy and verify it with third parties;
- perform other duties as required by law.

We work with vendors to enable them to accept payments from you using UNITPAY. In doing so, a vendor may share information about you with us, such as your mobile phone number or UNITPAY username, when you attempt to pay that vendor. We use this information to confirm to that vendor that you are a UNITPAY customer and that the vendor should enable UNITPAY as a form of payment for your purchase.

Regardless, we will not disclose your credit card number or bank account number to anyone you have paid or who has paid you through UNITPAY, except with your explicit permission or if we are required to do so to comply with a subpoena or other legal process.

## **HOW WE SHARE PERSONAL INFORMATION WITH OTHER PARTIES**

UNITPAY does not share your email address or phone number with third parties for promotional or marketing purposes We may share your personal information with:

- Companies that we plan to merge with or be acquired by or, in the event of any bankruptcy, a bankruptcy estate. Should such a combination occur, we will require that the new combined entity follow this privacy policy with respect to your personal information. If your personal information could be used contrary to this policy, you will receive prior notice and the opportunity to communicate preferences you may have, if applicable.
- Law enforcement, government officials, or other third parties when we are compelled to do so by a subpoena, court order or similar legal procedure, when we need to do so to comply with law we believe in good faith that the disclosure of personal information

## LT PAYMENTS PTE. LTD.

is necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of our User Agreement, or as otherwise required by law.

- Third party service providers who assist us in providing services to you or who provide fraud detection or similar services on our [or any vendor's] behalf.
- Your social web, should you designate your UNITPAY account transactions as "public" or "friends-only" payments such that other UNITPAY users can view your payments or when you otherwise request UNITPAY payments be posted to your social web. You may access our privacy controls to designate that all of your payments default to private as well. When you broadcast information to third-party services, such information is no longer under the control of UNITPAY and is subject to the terms of use and privacy policies of such third parties.
- UNITPAY does not send your personal information to third-party social networks unless you have specifically requested or authorized us to do so; Service providers under contract who help with parts of our business operations (for example, fraud prevention, payment processing, or technology services); Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.
- Other third parties with your consent or direction to do so.

## HOW YOU CAN ACCESS OR CHANGE YOUR PERSONAL INFORMATION

You can review and update your personal information at any time by logging in to your account and clicking the Account Settings tab or using one of our mobile applications.

## LINKS TO OTHER SITES

The Website may contain links to other sites. UNITPAY does not control the information collection of sites that can be reached through links from the website. We encourage our users to be aware when they are leaving our site and to read the privacy statements of each website that collects personally identifiable information.

## CHANGES TO OUR PRIVACY POLICY

UNITPAY is always improving, and as our service evolves we may occasionally update this Privacy Policy. If we modify this privacy policy, we will post the revised privacy policy to the website, and we will also revise the "last updated date" stated above. If we make material changes in the way we use personal information, we will notify you by posting an announcement on our service or by sending you an e-mail. It is your responsibility to periodically review this privacy policy and users are bound by any changes to the privacy policy by using the service after such changes have been first posted.

## HOW TO CONTACT US

If you have questions or concerns regarding this policy, or any feedback that you would like us to consider, please email us at [info@unitpay.net](mailto:info@unitpay.net) may also write to us at LT PAYMENTS PTE. LTD., Attn: Legal Department.