NOTICE ON THE PROCESSING OF PERSONAL DATA OF ELIPAY APPLICATION USERS

Eligma Ltd., company registration number 8106452000, business address Letaliska cesta 33F, 1000 Ljubljana, Slovenia (hereinafter "**Eligma**"), treats the protection of your personal data with utmost seriousness and responsibility. As a data controller, we consider it important that you understand how we process your personal data and ensure its security. For this reason, we recommend that you make yourself familiar with the content of this document. If you have any questions or requests in connection with the processing of your personal data, please contact us at info@eligma.com.

What do we use your personal data for?

The processing of your personal data is required for the operation of the Elipay application (hereinafter "**Elipay App**"). For example, your personal data is required to provide you with a digital wallet, which contains your balance, to carry out approved payments, to provide transaction history information, to assure technical support, to send important notifications about the use of the Elipay App, and to ensure the technical operation of the application. The legal basis for this kind of personal data processing is the agreement on the use of the Elipay App, which you concluded with Eligma by accepting the General Terms of Use of the Elipay Service of Paying at the creation of your user account in the Elipay App.

We will process your personal data for the purpose of sending offers and novelty notifications provided that you have previously given your express consent.

In order to perform statistical analyses on the use of the Elipay App, to improve the Elipay App, to improve the user experience and to develop our products, your personal data will be anonymized and used for the above purposes in the anonymized form.

What kind of personal data do we process?

In order to ensure the operation of the Elipay App, we process your name and surname, temporary or permanent residence address, e-mail address, telephone number, date of birth, place of birth, personal identification number, citizenship, the number, type and issuer of your identification document, information about your business activity and source of funds, payment data, application use data (the frequency of Elipay use, the features used, etc.).

Your name, surname, e-mail address and phone number are processed for the purposes of sending offers and novelty notifications.

How long do we keep your personal data?

Your personal data will be processed for the purposes of providing you with the Elipay App until you terminate your Elipay user account or until the balance in your Elipay wallet is transferred to your digital wallet after you terminate your Elipay user account. After the

user account is terminated, we will only keep the personal data that may have to be kept by law or that would be required for evidence or defense purposes if there was a possibility of legal claims, but for no longer than five years after the Elipay user account termination.

Your personal data processed for the purpose of sending offers and novelty notifications will be kept until the withdrawal of your consent, but no longer than five years after your consent. After the expiration of this period, we will again ask for your consent.

Will we disclose your personal information to third parties or transfer them outside the EU?

We will only disclose your personal information to those third parties who will process personal data on our behalf. The third parties are our contract partners who provide us with the services of use analysis, direct marketing and data storage. We do not transfer your personal information outside the EU.

For the purposes of preventing or investigating Elipay App fraud, we may need to disclose your personal information to law enforcement authorities.

What are your rights regarding the processing of your personal data?

You can always request access to your personal data, or request its rectification or erasure, or restrict or object to its processing. We will notify you if your request affects the possibility of further operation of the Elipay App. You also have the right of personal data portability.

Your consent for the processing of personal data for the purpose of sending offers and novelty notifications may be withdrawn at any time; however, the withdrawal of your consent does not affect the lawfulness of the processing of your personal data on the basis of your consent for the period prior to the withdrawal.

We will notify you in the event of a violation of protection of personal data in accordance with the conditions laid down by the applicable legislation.

Your requests will be fulfilled without undue delay, but in any case within one month of the receipt of your request unless otherwise provided by the applicable legislation. In the event of complexity and a large number of requests, this time limit may be extended by up to two months. We will notify you of any such extension within one month of receiving your request, together with the reasons for the delay.

If you believe that we do not process your personal data in accordance with the applicable legislation, you can file a complaint with the Slovenian Information Commissioner at the e-mail address gp.ip@ip-rs.si or by regular mail to Zaloska cesta 59, 1000 Ljubljana, Slovenia.