

Effective Date: Nov 25, 2018

Welcome to Mobilum.

Mobilum Limited and its affiliates (collectively “Mobilum”, “we” and “us”) respect your privacy. We offer services that enable Users to perform safe and fast online payment transactions.

This Privacy Policy (“Policy”) describes the types of Personal Data we gather through our systems and services (“Services”) and via our online presence, which include our main website at www.mobilum.com, www.xcard.io (collectively, our “Sites”). This policy also describes how we use Personal Data, with whom we share it, your rights and choices, and how you can contact us about our privacy practices. While using Mobilum products or website you might be directed to other websites, products services and you should familiarize yourself with their privacy standards. Please read this notice carefully. By continuing to interact with our Services, you are consenting to the practices described in this Policy.

1. Overview

Mobilum obtains Personal Data about you from various sources to provide our Services and to manage our Sites. “You” may be a visitor to one of our websites, a user of one or more of our Services (“User” or “Mobilum User”).

PERSONAL DATA WE COLLECT ABOUT YOU

We need to collect information about you to provide you with the Services or the support your request. The type of information we collect can vary depending on the country from which you access our Services. Additionally, you can choose to voluntarily provide information to us.

Information You Provide

We collect information you provide when you apply or sign up for a Mobilum account or other Services, go through our identity or account verification process, authenticate into your account, communicate with us, answer our surveys, upload content, or otherwise use the Services.

We collect information about you when you use our Services, including:

- **Identification Information.** Your name; email address; mailing address; phone number; photograph; birthdate; passport, driver’s license, Social Security, Taxpayer Identification, or other government-issued identification; or other historical, contact, and demographic information when you apply or sign up for a Mobilum account or other Services, signature, and authentication credentials (for example, information you use to login to your account), including IP address.
- **Financial Information.** Information such as bank account, payment card numbers, credit reports, and other publicly available information.
- **Tax information.** Withholding allowances and tax filing status.
- **Transaction Information.** When you use our Services to make, accept, request, or record payments, we collect information about when and where the transactions occur, the names of the transacting parties, a description of the transactions, the payment or transfer amounts, billing and shipping information, and the devices and payment methods used to complete the transactions.
- **Other Information You Provide.** Information that you voluntarily provide to us, including your survey responses; participation in contests, promotions, or other prospective seller marketing forms or devices; suggestions for improvements; referrals; or any other actions performed on the Services.

Information We Collect From Your Use of our Services

We collect information about you and the devices you use to access the Services, such as your computer, mobile phone, or tablet. The information that we collect includes:

- **Precise Geolocation Information.** The location of your device.
- **Device Information.** Information about your device, including your hardware model, operating system and version, device name, unique device identifier, mobile network information, and information about the device’s interaction with our Services.
- **Use Information.** Information about how you use our Services, including your access time, “log-in” and “log-out” information, browser type and language, country and language setting on your device, Internet Protocol (“IP”) address, the domain name of your Internet service provider, other attributes about your browser, mobile device and operating system, any specific page you visit on our platform, content you view, features you use, the date and time of your visit to or use of the Services, your search terms, the website you

visited before you visited or used the Services, data about how you interact with our Services, and other clickstream data.

- **Customer Information.** Information you collect from your customers, including email address, phone number, payment information, or other information.

Information We Collect From Other Sources

We also collect information about you from third parties, including:

- **Identity Verification.** Information from third-party verification services, credit bureaus, financial institutions, mailing list providers, and publicly available sources. In some circumstances, where lawful, this information may include your government-issued identification number.
- **Background Information.** To the extent permitted by applicable laws, we may obtain background check reports from public records of criminal convictions and arrest records. We may use your information, including your full name, government-issued identification number, and date of birth, to obtain such reports.
- **Credit, Compliance and Fraud.** Information about you from third parties in connection with any credit investigation, credit eligibility, identity or account verification process, fraud detection process, or collection procedure, or as may otherwise be required by applicable law. This includes, without limitation, the receipt and exchange of account or credit-related information with any credit reporting agency or credit bureau, where lawful, and any person or corporation with whom you have had, currently have, or may have a financial relationship, including without limitation past, present, and future places of employment, financial institutions, and personal reporting agencies.

Children's Information

Our Services are general audience services not directed at children under the age of 13. If we obtain actual knowledge that any information we collect has been provided by a child under the age of 13, we will promptly delete that information.

HOW WE USE YOUR INFORMATION

We may use information about you for a number of purposes, including:

Providing, Improving, and Developing our Services

- Determining whether the Services are available in your country;
- Processing or recording payment transactions or money transfers;
- Otherwise providing you with the Mobilum products and features you choose to use;
- Displaying your historical transaction or appointment information;
- Providing, maintaining and improving our Services;
- Developing new products and services;
- Delivering the information and support you request, including technical notices, security alerts, and support and administrative messages including to resolve disputes, collect fees, and provide assistance for problems with our Services or your Mobilum account;
- Improving, personalizing, and facilitating your use of our Services;
- Measuring, tracking, and analyzing trends and usage in connection with your use or the performance of our Services.

Communicating with You About our Services

- Sending you information we think you may find useful or which you have requested from us about our products and services;
- Conducting surveys and collecting feedback about our Services.

Protecting our Services and Maintaining a Trusted Environment

- Investigating, detecting, preventing, or reporting fraud, misrepresentations, security breaches or incidents, other potentially prohibited or illegal activities, or to otherwise help protect your account, including to dispute chargebacks on your behalf;

- Protecting our, our customers', or your customers' rights or property, or the security or integrity of our Services;
- Enforcing our [Terms of Service](#) or other applicable agreements or policies;
- Verifying your identity (e.g., through government-issued identification numbers);
- Complying with any applicable laws or regulations, or in response to lawful requests for information from the government or through legal process;
- Fulfilling any other purpose disclosed to you in connection with our Services;
- Contacting you to resolve disputes, collect fees, and provide assistance with our Services.

Advertising and Marketing

- Marketing of our Services;
- Communicating with you about opportunities, products, services, contests, promotions, discounts, incentives, surveys, and rewards offered by us and select partners;
- If we send you marketing emails, each email will contain instructions permitting you to “opt out” of receiving future marketing or other communications.

Other Uses

- For any other purpose disclosed to you in connection with our Services from time to time.

HOW WE SHARE YOUR INFORMATION

We may share information about you as follows:

With Other Users of our Services with Whom You Interact

- With other users of our Services with whom you interact through your own use of our Services. For example, we may share information when you make or accept a payment, appointment, or money transfer using our Services.

With our Affiliates

- With our group companies and corporate affiliates, for the purposes outlined above.

With Third Parties

- With third parties to provide, maintain, and improve our Services, including service providers who access information about you to perform services on our behalf (e.g., fraud prevention, identity verification, and fee collection services), as well as financial institutions, payment networks, payment card associations, credit bureaus, partners providing services on Mobilum's behalf, and other entities in connection with the Services;
- With third parties that run advertising campaigns, contests, special offers, or other events or activities on our behalf or in connection with our Services.

Business Transfers and Corporate Changes

- To a subsequent owner, co-owner, or operator of one or more of the Services; or
- In connection with (including, without limitation, during the negotiation or due diligence process of) a corporate merger, consolidation, or restructuring; the sale of substantially all of our stock and/or assets; financing, acquisition, divestiture, or dissolution of all or a portion of our business; or other corporate change.

Safety and Compliance with Law

- If we believe that disclosure is reasonably necessary (i) to comply with any applicable law, regulation, legal process or governmental request (e.g., from tax authorities, law enforcement agencies, etc.); (ii) to enforce or comply with our [General Terms](#) or other applicable agreements or policies; (iii) to protect our or our customers' rights or property, or the security or integrity of our Services; or (iv) to protect us, users of our Services or the public from harm, fraud, or potentially prohibited or illegal activities.

With Your Consent

- With your consent. For example:

- At your direction or as described at the time you agree to share;
- When you authorize a third party application or website to access your information.

Aggregated and Anonymized Information

- We also may share (within our group of companies or with third parties) aggregated and anonymized information that does not specifically identify you or any individual user of our Services.

HOW LONG WE RETAIN YOUR INFORMATION

We generally retain your information as long as reasonably necessary to provide you the Services or to comply with applicable law. However, even after you deactivate your account, we can retain copies of information about you and any transactions or Services in which you may have participated for a period of time that is consistent with applicable law, applicable statute of limitations or as we believe is reasonably necessary to comply with applicable law, regulation, legal process, or governmental request, to detect or prevent fraud, to collect fees owed, to resolve disputes, to address problems with our Services, to assist with investigations, to enforce our [General Terms](#) or other applicable agreements or policies, or to take any other actions consistent with applicable law.

COOKIES AND OTHER SIMILAR TECHNOLOGIES

We use various technologies to collect information when you access or use our Services, including placing a piece of code, commonly referred to as a “cookie,” or similar technology on your device and using web beacons. Cookies are small data files that are stored on your hard drive or in your device memory when you visit a website or view a message. Among other things, cookies support the integrity of our registration process, retain your preferences and account settings, and help evaluate and compile aggregated statistics about user activity. We will begin collecting information about you or from activity on devices you use as soon as you use our Services. By using our Services, you permit us to collect and use your information from activity on devices you use in accordance with this Privacy Notice.

Certain cookies we use last only for the duration of your web or application session and expire when you close your browser or exit the application. Other cookies are used to remember you when you return to use the Services and, as such, will last longer.

We may use cookies to:

- Remember that you have visited us or used the Services before. This allows us to identify the number of unique visitors we receive, so that we can provide enough capacity to accommodate all of our users.
- Customize elements of the promotional layout and/or content of our Services.
- Collect data about the way you interact with our Services (e.g., when you use certain features).
- Collect data to assess and improve our advertising campaigns, including sending information to our business partners.
- Allow our business partners (including third parties) to use these tracking technologies to track your behavior on our behalf on our Platform (including when you use multiple devices) and on partner websites.
- Enable third parties to collect data about the way you interact across sites outside of our Services.
- Collect anonymous statistical information about how you use the Services (including the length of your web or application session) and the location from which you access the Services, so that we can improve the Services and learn which elements and functions of the Services are most popular with our users.

Some of the cookies used in the Services are set by us, and others are set by third parties who deliver services on our behalf.

Most web and mobile device browsers are set to automatically accept cookies by default. However, you can change your browser settings to prevent automatic acceptance of cookies, or to notify you each time a cookie is set.

UPDATES TO THIS PRIVACY POLICY AND NOTIFICATIONS

We may change this Privacy Policy from time to time to reflect new services, changes in our Personal Data practices or relevant laws. The “Last updated” legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy on the Services. We may provide you with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on our website and, if you are a User, by contacting you through your Mobilum app, email address and/or the physical address listed in your Mobilum account.

JURISDICTION-SPECIFIC PROVISIONS

Residents of the European Economic Area (EEA) and Switzerland.

The entity responsible for the collection and processing of Personal Data for residents of the EEA and Switzerland is Mobilum Limited, a company incorporated in Gibraltar with offices at Suite 23 Portland House Glacis Road GX111AA Gibraltar .

CONTACT US

Mobilum
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If you have any questions or concerns regarding our notice, or if you believe our notice or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with our Privacy Department listed above, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We may keep records of your request and any resolution.