

PRIVACY POLICY

1. GENERAL PROVISIONS

- 1.1. Together with our General Terms of Service (*also referred as: "Terms"*) this Privacy Policy governs The People's SCE with limited liability a European Cooperative Society, registered office at 53 Boulevard Royal, 2449 Luxembourg, R.C.S. Luxembourgs (*hereinafter: SCE*) collection, processing and use of your Personal Information/data by using SCE's:
- Website at <https://ecredits.com> (*also referred as: "Website"*),
 - eWallet Mobile app and Web application (*also referred as: "App" or "eWallet App"*) (available at Google store and Apple app store and Website) which provides the Services for Users with registered Accounts in accordance with Terms,
 - Any services accessible through the eWallet App and/or Website, provided by SCE (*also referred as: "Services"*).

This policy sets out the basis on which any Personal data we collect from You, or that You provide to SCE, will be processed and used by SCE.

This policy represents an integral part of the Terms. Definitions and meaning in this policy should be read together with the Terms.

- 1.2. Personal information/data (also known as Personal Identifiable Information [PII]) refers to any information that can be associated with a specific person (*also referred as: "You" or "User"*) and can be used to identify that person, directly or indirectly, in particular by reference to an identifier such as a name, address, e-mail address, an identification number, location data, mobile number, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person and other required information User provides to gain and operate a registered Account (*in this policy collectively referred as: "Personal data" or "personal information"*).
- 1.3. SCE is committed to protecting and respecting your privacy and your right to fair and just processing of your Personal data. This Privacy policy is intended to help you better understand how we collect, use, process and store your Personal data and describes your choices regarding certain types of processing. We are aware of the importance of how Personal data are handled and we assure you that we observe all applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 (*hereinafter: GDPR*).
- 1.4. Unless otherwise indicated, terms used in this Regulation shall have the same meaning as under GDPR.
- 1.5. SCE is the data controller responsible for your Personal data. This privacy policy is issued on behalf of the SCE so when we mention SCE, "we", "us" or "our" in this privacy policy, we are referring to the company SCE and its related group of undertakings, responsible for processing your data.
- 1.6. We have data protection and privacy officer who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, including any requests, please use the contact details set out below.

1.7. SCE's contact details:

Full name of legal entity:

The People's SCE with limited liability a European Cooperative Society, registered office at 53 Boulevard Royal, 2449 Luxembourg, R.C.S. Luxembourgs

Email address: privacy@ecredits.com

1.8. Data protection officer

SCE has appointed a data protection officer (*also referred as: "DPO"*), who has several responsibilities, based on GDPR including but not limited to:

- monitoring SCE's compliance with the GDPR and other data protection laws;
- raising awareness of data protection issues, training SCE staff and conducting internal audits; and
- cooperating with supervisory authorities on our behalf.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us via SCE's e-mail address privacy@ecredits.com

Complaints

You have the right to make a complaint at any time to the Luxembourg Data protection Office. We would, however, appreciate the chance to deal with your concerns before you approach the data protection office, so please contact us in the first instance.

SCE will:

- Always keep your data safe and private.
- Never sell your data.
- Allow you to manage and review your marketing communication preferences at any time.

SCE does not collect or process your genetic, physiological, mental, racial or ethnic origin, cultural or social identity Personal data, political opinions, religious or philosophical beliefs, trade union memberships, data concerning health or data concerning a natural person's sex life or sexual orientation.

2. COOKIE POLICY

2.1. When Users access eWallet App, SCE may place small data files called cookies on User's computers or other devices. This helps us to provide you with a good experience when you use eWallet App or browse our Website and also allows us to improve the eWallet App and our Website. SCE uses these technologies to recognize you as a User of the Website, eWallet App and/or other Services in order to customize the Website and advertising content, measure communication and marketing effectiveness and collect information about User's devices to mitigate risk, help prevent fraud and promote trust and safety.

2.2. We may use cookies, pixel tags, web beacons, and other tracking technologies to collect information about you when you interact with our Services, including information about your browsing behavior on the eWallet App.

2.3. What cookies do we use?

We use both session and persistent cookies. Session cookies expire when you log out of your account or close your browser. Persistent cookies remain on your computer or other access device until deleted or otherwise expire. The Website and the eWallet uses the following cookies:

Cookie name	What is it for?	Type	Duration	Domain
“Visited” cookie	Identifies the first visit of the User on the Website and expires in one month from the last usage of the Website	First visit	1 month from last usage of the Website	ecredits.com
»Browser_lang« cookie	Saves the chosen language from the User on the Website	Language	1 month from last usage of the Website	ecredits.com
Google analytics	Analysing the usage of the Website	Marketing	When using and 2 years from the last usage	ecredits.com
Active campaign	Analysing the usage of the Website	Marketing	1 month from last usage of the Website	ecredits.com
Firebase	eWallet app to analyze usage of the wallet	Marketing	1 month from last usage of the Website	ecredits.com

2.4. Most web browsers are set to accept cookies by default. You are free to decline most of our cookies if your browser or browser add-on permits but choosing to remove or disable our cookies may interfere with your use and functionality of the Services. Additionally, we may use certain persistent cookies that are not affected by your browser settings but will use such cookies solely for identity verification and fraud prevention purposes. For more information about cookies and how to block, delete or disable them, please refer to your browser instructions, or contact us at privacy@ecredits.com

3. INFORMATION WE COLLECT ABOUT YOU

SCE may collect, process, use, store and transfer different kinds of Personal data about you which we have grouped together as follows:

3.1. Submitted Personal information:

This is Personal information you may give us about you by filling in forms on Website, and/or eWallet App and/or corresponding with us by mail, phone, email or otherwise. This includes Personal information You provide by:

- **filling in forms** on the eWallet App, Website and/or subscribing to our Newsletter (such as eCredits news and updates that provide information regarding the latest developments of the eWallet App, promotions, and industry news), download a document from Website, register for a webinar or enter a SCE's contest, survey or other marketing activity. The latter shall be further described in terms and conditions of the relevant activity, and/or
- **(actively) corresponding with us** (for example, by e-mail, via the chat functions on the eWallet App and/or the Website and/or through our customer service or otherwise actively correspond with SCE) and/or participating in discussion boards or other social media functions on the eWallet App or the Website,
- **providing Personal information and requested documents** in the context of verifying User's identification. (for Merchants)

(collectively also referred as: Submitted Personal information)

Submitted Personal information in particular includes:

1. **Identity data:** first name, maiden name, last name, job title, date of birth username, password and other registration information and/or similar identifiers,
2. **Contact data:** address, e-mail address, phone number,
3. **Financial data** such as:
 - your Addresses on the eCredits blockchain ,
 - balance of your Assets on Addresses,
 - information provided from third-party services
4. **Marketing and Communications Data** which includes your submitted preferences in receiving marketing material from us and our third parties and your communication preferences.
5. **Beneficial owners (for Merchants):** When embarking upon a legal relationship with SCE and/or concluding occasional transactions by using SCE Services through legal entities and similar entities, SCE can identify beneficial owners, whereas "beneficial owner" means a natural person on whose initiative or in whose interest a transaction or activity is carried out or a business relationship is ultimately constituted. In the case of such legal entities, the "beneficial owner" is also the natural person in whose possession or under whose control the legal entity ultimately is situated.

3.2. Personal information collected by using automated technologies or interactions:

This is Personal information you may give us about you as you interact with our Websites, we may automatically collect Technical Data about your equipment, mobile device, browsing actions, including your IP address, patterns and other activity when using Website and/or eWallet App. SCE collects this Personal data by using cookies, server logs and other similar technologies. This allows us to recognize Users and avoid repetitive requests for the same information. With automation technologies we track, collect and store the User behavior on the Website.

(collectively also referred as: Automated Personal data)

Automated Personal data in particular includes:

1. **Transaction data:** Keeping track of performed transactions and/or transfer of your Assets on eWallet Apps and/or Website and vice-versa to Your or other ECR Addresses. Collected transaction data includes date, time, amount, currencies used, exchange rate, beneficiary details, details and location of the counterparty associated with the transaction, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, device information used to facilitate the payment and the payment instrument used;
2. **Purchase data:** For the purposes of monitoring (in sense of "execution of a contract" within the meaning of GDPR) and for the purposes of identification and/or prevention of possible manipulation, we also collect certain information about your use of the Services on the eWallet App, including but not limited to:
 - keeping track of performed ECR Payments and ECR transactions and/or transfer of your Assets on eWallet App, and/or Website and vice-versa to Your ECR Address or Third-Party wallets,
 - keeping track of searched and/or used Merchants.

Collected/monitored trading data includes date, time, amount, currencies used, beneficiary details, details of the counterparty associated with the individual transaction, IP address of sender and receiver, sender's and receiver's name and registration information, messages sent or received with the payment, device information used to facilitate the payment and the payment instrument used,

3. **Profile Data:** purchases or orders made by you, your interests, preferences, feedback and survey responses.
4. **Usage Data:** includes information about how you use Website, eWallet App and/or Services.
5. **Technical Data:** includes internet protocol (IP) address, your login data, mobile device, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and eWallet App and other technology on the devices you use to access our Websites, and/or eWallet App.

3.3. Personal data obtained with authorized third parties or publicly available sources:

We may obtain Your Personal data about you from authorized partners and public sources, namely publicly available registers such as company registers and other publicly accessible sources which provide reliable data about You, Your family members and/or Your close business associates. Third parties are business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, fraud prevention agencies, customer service providers and developers which are required to ensure that they comply with the GDPR (Art. 28 GDPR).

(collectively also referred as: Personal data obtained by third parties)

4. USES MADE OF THE PERSONAL DATA

4.1. Below is a summary of the key types of Personal data that we make use of as part of the SCE Services. For more information on how these types of data are used and for which purposes then please see the table below.

4.2. We use information held about you in the following ways:

- **Submitted Personal data** is used:
 - to carry out our obligations arising from any transactions you enter into with us, for example to provide you SCE Services in accordance with Terms, such as creating an Account, search for Merchants, etc.;
 - to notify you about changes to our Service or Terms;

- **Automated Personal data** is used:
 - to provide you with information about other Services we offer that are similar to those that you have already used or enquired about;
 - to ensure that content from our Website is presented in the most effective manner for you and for your mobile device and/or personal computer;
 - to administer our Website and eWallet App for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
 - to improve our Website and the eWallet App to ensure that content is presented in the most effective manner for you and for your mobile device and/or computer;
 - to allow you to participate in interactive features of our Services, when you choose to do so;
 - as part of our efforts to keep our Website and the eWallet App safe and secure;
 - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
 - to make suggestions and recommendations to you and other Users of our Website and the eWallet App about goods or Services that may interest you or them;
 - to confirm your eligibility to use our Services; and
 - to comply with our regulatory obligations.

- **Personal data obtained by third parties:** We will combine this information with Submitted Personal data you give to us and Automated Personal data we collect about you. We will use this information and the combined information:
 - to help us better understand your circumstances and behavior so that we may make decisions about how we manage your Account;
 - to process applications for products and Services available through us including making decisions about whether to agree to approve any applications; and
 - for the purposes set out above (depending on the types of information we receive).

4.3. We may associate any category of Personal data to any other category of Personal data and will treat the combined information as Personal data in accordance with this policy for as long as it is combined.

4.4. For advertising networks, we utilize anonymized Personal data in order to serve relevant adverts to target segments. However, SCE will never disclose identifiable information to advertisers.

5. PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

5.1. We have set out below, in a table format, a description of all the ways we use your Personal data as stated above, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

5.2. Note that we may process your Personal data for more than one lawful ground depending on the specific purpose for which we are using your Personal data. Please contact us via in-eWallet App support if you need details about the specific legal ground we are relying on to process your Personal data where more than one ground has been set out in the table below.

Purpose of processing Personal data	Type/category of Personal data	Lawful basis	Legitimate interests
<p>To provide the SCE Services: - To register your Account and to carry out our obligations arising from any transactions you enter into with us, using Services on eWallet App and/or Website and to provide you with the information, products and Services that you request from us.</p>	<p>– Submitted Personal data such as general personal information, Contact data,– Automated data such as Transaction data, , Profile data, Usage data and Technical data.</p>	<p>Performance of a contract to which the User is party or in order to take steps at the request of the User prior to entering into a contract with SCE.</p>	<p>Being efficient about how we fulfil our legal and contractual obligations. Our commercial interest in providing you with a good Service and in efficient manner. Complying with regulations that apply to us.</p>
<p>To keep the SCE Services up and running: – To administer our Site and the eWallet App for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes; – To notify you about changes to our Service; – As part of our efforts to keep our Website and the eWallet App safe and secure.</p>	<p>– Submitted Personal data such as general personal information, Contact data, – Automated Personal data such as Transaction data, Profile data, Usage data and Technical data.</p>	<p>Processing is necessary for the purposes of the legitimate interests pursued by SCE and/or for the performance of a contract.</p>	<p>To ensure that content from our Website is presented in the most effective manner and to prevent possible abuses of Website, eWallet App or Services.</p>
<p>- To use data analytics to improve our Website, Services, marketing,</p>	<p>– Automated Personal data such as Transaction data, Profile data, Usage data and Technical data.</p>	<p>Processing is necessary for the purposes of the</p>	<p>To define types of customers for our Services, to keep our Website updated</p>

customer relationships and user-experiences.		legitimate interests pursued by SCE.	and relevant, to develop our business and to inform our marketing strategy.
- To improve quality of our Services and to make suggestions and recommendations to you about Services or events that may be of interest to you.	- Submitted Personal data such as general contact data, - Automated Personal data such as Transaction data, Profile data, Usage data, Technical data.	Processing is necessary for the purposes of the legitimate interests pursued by SCE.	To understand interests of Users and to provide them further development and improvement of Services.

What do we mean when we say:

Legitimate Interest: this means the interest of ours as a business in conducting and managing SCE to enable us to provide to you the SCE Services and offer the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). Within the meaning of “legitimate interest” SCE (also) pursues its legitimate interest of identification and/or prevention of possible insider trading and/or market manipulation, we also collect and process certain information about your use of the Services on the eWallet App, such as use of the eWallet App, Identification data, Transaction data, Profile, Usage data and Technical data.

Fulfilling a Contract: this means processing your Personal data where it is necessary to provide you use of the Services on the eWallet App within the meaning of the “performance of a contract” to which you are a party or to take steps at your request before entering into such a contract.

6. MARKETING

- 6.1. SCE is striving to provide clear information of Personal data usage for our marketing purposes and simple access to individual’s communication preferences management or opt-out from receiving any marketing communications from us whenever you want.
- 6.2. We provide you clear choices on your Personal data uses for marketing and advertising purposes. You can always access your personal communication preferences management page via our e-mail privacy@ecredits.com.

7. PROMOTIONAL OFFERS FROM US

- 7.1. We may use your Personal data (such as your Submitted Information and Automated Personal data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.
- 7.2. You will receive marketing communications from us if you have signed up to and/or utilize the SCE Services and, in each case, you have not opted out of receiving marketing notifications.

8. THIRD-PARTY MARKETING

- 8.1. We will not share your Personal data with any company outside the SCE group that is not our contracted data processor, who is obliged to process Personal data on behalf of SCE at least in such a manner that processing will meet the requirements under GDPR.

9. OPTING OUT

- 9.1. You can stop receiving marketing messages at any time by adjusting your preferences in communication preferences management page, accessible in e-mail or by sending your choice to privacy@ecredits.com.

10. DISCLOSURE OF YOUR PERSONAL DATA

10.1. Data processing partners

1. We will disclose the Personal data we collect from you to certain third parties (processors) who use Personal data in delivering their Services to us. Such partners shall use Personal data securely and confidentially and under strict contractual controls in accordance with data protection laws and enforced by SCE.
2. We send Personal data to the following sets of data processors in order to perform the SCE Services and/or to provide you customized marketing communication with your consent:
 - **Third-party exchanges:** These are the companies where you can exchange cryptocurrencies which you store on the eWallet app;
 - **Fraud prevention agencies:** This is in order to verify your identity, protect against fraud, comply with anti-money laundering laws and to confirm your eligibility to use our products and Services;
 - **Cloud storage providers:** This is in order to safely and securely store your data with SCE;
 - **Advertisers and analytics providers:** For advertising networks, we utilize anonymized Personal data in order to serve relevant adverts to target segments. However, SCE will never disclose identifiable information to advertisers.
 - **Marketing automation and CRM provider:** This data processor enables us to collect and manage your Personal data at one place (at least in such a manner that processing will meet the requirements under GDPR) and to ensure you the rights to access, manage, export or delete your Personal data according to GDPR.
 - **Affiliated companies:** In order to provide a unified service across all of our Services, we may disclose your Personal information to any member of the corporate group of undertakings, which means any of our subsidiaries or affiliated entities. These Companies will be acting as joint controllers or processors in order to provide the services as described in Terms of use.

10.2. We may also disclose your personal information in the following circumstances:

1. If SCE or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
2. If we are under a duty to disclose or share your Personal data in order to comply with any legal or regulatory obligation or request.
3. In order to:
 - enforce or apply the Terms of use and/or any other agreements between you and SCE or to investigate potential breaches; or

- protect the rights, property or safety of SCE, our customers or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection.

11. STORAGE SECURITY & INTERNATIONAL TRANSFERS

- 11.1. The Personal data that we collect from you will be transferred to, and stored at, a destination inside the European Economic Area (EEA). As we provide an international service your Personal data may be processed outside of the EEA in order for us to fulfill our contract with you to provide the SCE Services. We will need to process your Personal data in order for us, for example, to action a request made by you to execute an international payment, process your payment details, provide global anti-money laundering and counter terrorist financing solutions and provide ongoing support services. We will take all steps to ensure that your data is treated securely and in accordance with this privacy policy.
- 11.2. All information you provide to us is stored on our secure servers, encrypted at rest. Any payment transactions carried out by us or our chosen third-party provider of payment processing services will be encrypted in transit. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our eWallet App and/or our Website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.
- 11.3. Unfortunately, the transmission of information via the internet and/or blockchain protocol is not completely secure. Although we will do our best to protect your Personal data, we cannot guarantee the security of your data transmitted to our eWallet App or our Website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.
- 11.4. Certain Services include social networking, chat room or forum features. Ensure when using these features that you do not submit any personal data that you do not want to be seen, collected or used by other users.

12. RETAINING YOUR INFORMATION

We will keep your data:

- if you have consented to use as part of processing until such time as you withdraw your consent;
- if we need your personal data to undertake an agreement we will keep it until such time as the contractual relationship with you ceases or legal retention period expires;
- if we use your Personal Data on the basis of Legitimate Interest until such time as your overriding interest obliges us to delete the data or anonymize it.

Purpose	Time for which the data is kept
1. To manage your user registration - Account	We will process your data for the time during which you remain a registered user. This is the minimum volume of personal data, that you need to give to us in any point in time if you would like to keep your account active.

2. Development, performance and services contract	We will process your data for the time necessary to manage the services that you use.
3. Customer Support	We will process your data for the time necessary to meet your request, and further until the usage of services end, so we can give you a full user experience.
4. Marketing	We will process your data until you unsubscribe or cancel your subscription to the newsletter etc.
5. Analysis of usability and quality	We will process your data occasionally for the time during which we proceed to carry out a specific quality action or survey or until we anonymize your browsing data.

13. YOUR LEGAL RIGHTS

13.1. You have rights under data protection laws in relation to your Personal data. Please see below to find out more about these rights:

1. **Request access to your personal data (commonly known as a “data subject access request“).** This enables you to receive a copy of the Personal data we hold about you. If you require this, then please reach out to our support team at privacy@ecredits.com
2. **Request correction of the Personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us. If you require this, then please reach out to our support team via the in-eWallet App chat function.
3. **Request erasure of your personal data.** This enables you to ask us to delete or remove Personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Please note that these retention requirements supersede any right to erasure requests under applicable data protection laws.

4. **Object to processing of your Personal data.** This is in situations where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your

information which override your rights. If you object to the processing of certain data, then we may not be able to provide the SCE Services and it is likely we will have to terminate your account.

5. **Request restriction of processing of your Personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - if you want us to establish the data's accuracy;
 - where our use of the data is unlawful, but you do not want us to erase it;
 - where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it.

6. **Request the transfer of your personal data to you or to a third party.** We will provide to you, your Personal data in a structured, commonly used, machine-readable format, which you can then transfer to an applicable third party. If you require this then please reach out to our support team via privacy@ecredits.com

7. **Withdraw consent at any time where we are relying on consent to process your Personal data.** However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide the SCE Services to you. Regardless of Users withdrawal of consent, SCE is obligated to process and store relevant Personal data for certain period in order to comply with legislation on prevention of money laundering, money laundering, terrorist financing, fraud, or any other financial crime.

13.2. Please note that any requests in relation to the restriction of the processing of your data means that we may not be able to perform the contract we have or are trying to enter into with you (including the SCE Services). In this case, we may have to cancel your use of the SCE Services but we will notify you if this is the case at the time.

14. MISCELLANEOUS

14.1. NO FEE USUALLY REQUIRED

You will not have to pay a fee to access your Personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

14.2. WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal data (or to exercise any of your other rights). This is a security measure to ensure that Personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

14.3. TIME LIMIT TO RESPOND

We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

14.4. IF YOU FAIL TO PROVIDE PERSONAL DATA

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (including the SCE Services). In this case, we may have to cancel your use of the SCE Services but we will notify you if this is the case at the time.

15. CHANGES TO PRIVACY POLICY

15.1. Any changes we may make to our privacy policy in the future will be posted on the Website or within the eWallet App and, where appropriate, notified to you by e-mail and/or when you next start the eWallet App or log onto the Website. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the eWallet App and/or the Services.

16. CONTACT

16.1. All questions relating to data and your privacy are welcomed and should be addressed to our support team or to our appointed data protection officer. If you have any questions, comments or requests regarding this privacy policy then please:

- Contact us via our support team: privacy@ecredits.com

Luxembourg, on October, 2021