

Data Privacy, Protection & Cookie Policy

This data privacy, protection and cookie policy describes your privacy rights regarding VASkey's ("we", "us" or "our") collection, use, storage, sharing and protection of your personal information. It applies to our website and all related sites, applications, services and tools regardless of how you access or use them. This Data Privacy, Protection and Cookie Policy (the "Privacy Policy") will help you understand how we use your information and what we do with it. However, this Privacy Policy does not apply to services that are not owned or controlled by VASkey, including third-party websites and the services of other VASkey's merchants. Our goal is to handle personal data provided to us in compliance with applicable data privacy and protection laws. This Privacy Policy applies to all forms of systems, operations and processes within the VASkey environment that involve the collection, storage, use, transmission and disposal of Personal Information.

We respect the privacy of our online visitors and registered users ("Users") as such we will take reasonable steps to protect your information.

To use our website or any of our products or services, your consent is required for the use of your data as described in this Privacy Policy

1. Overview

This Privacy Policy is intended to set certain standards across the operations of VASkey.

2. Updates, Modifications & Amendments

We may need to update, modify or amend our Privacy Policy as our technology evolves and as required by law. We reserve the right to make changes to this Privacy Policy from time to time and notify Users of material changes. The Privacy Policy will apply from the effective date provided on our website.

We advise that you check this page often, referring to the date of the last modification on the page. If a User objects to any of the changes to this Privacy Policy, the User must cease using this Site, or terminate their account in the event an account has been created.

3. Age Restriction

Our website and services are not directed to children under 18. We do not knowingly collect information from children under 18. If as a parent or guardian, you become aware that your child or ward child has provided us with any information without your consent, please contact us through the details provided in this Privacy Policy.

4. The Information We Collect

4.1 Personal Information

As part of our operations, VASkey collects and processes certain types of information (such as name, telephone numbers, address etc.) of individuals that makes them easily identifiable. These individuals include current, past and prospective employees, merchants, suppliers/vendors, customers of merchants, Users and other individuals whom VASkey communicates or deals with, jointly and/or severally ("Data Subject(s)").

VASkey is firmly committed to complying with applicable data protection laws, regulations, rules and principles to ensure security of Personal Information handled by the Company.

To gain full access to our website and services, you must register for a VASkey account. When you register for an account, we collect Personal Information which you voluntarily provide to us. Personal Information refers to information relating to an identified person or information that can be used to identify you, (e.g. email address, bank details, name, telephone number). It may also include anonymous information that may be linked to you specifically, (e.g. IP address).

We use your Personal Information to:

1. provide you with the required services.
2. respond to your questions or requests
3. improve features, website content and analyse data to develop products and services
4. address inappropriate use of our website
5. prevent, detect and manage risk against fraud and illegal activities using internal and third party screening tools
6. send you marketing content, newsletters and service updates curated by VASkey, however, we will provide you with an option to unsubscribe if you do not want to hear from us

7. verify your identity and the information you provide in line with VASkey's statutory obligations using internal and third party tools
8. maintain up-to-date records
9. resolve disputes that may arise, including investigations by law enforcement or regulatory bodies
10. any other purpose that we disclose to you in the course of providing VASkey services to you

We may retrieve additional Personal Information about you from third parties and other identification/verification services such as your financial institution and payment processor. With your consent, we may also collect additional Personal Information in other ways including emails, surveys, and other forms of communication. Once you begin using our services through your VASkey account we will keep records of your transactions and collect information of your other activities related to our services. We will not share or disclose your Personal Information with a third party without your consent except as may be required for the purpose of providing you with our services or under applicable legislations.

In providing you with the services, we may rely on third-party servers located in foreign jurisdictions from time to time, which as a result, may require the transfer or maintenance of your personally identifiable information on computers or servers in foreign jurisdictions. We will endeavour to ensure that such foreign jurisdictions have data protection legislation that is no less than the existing data protection regulations in force in Ghana and your personally identifiable information is treated in a safe and secure manner.

4.2 Mobile Money Transaction Notification SMS

As part of our operations, VASkey collects and processes transaction notification SMS data (such as transaction ID, amount, balance etc.) of each Mobile Money transaction carried out by individuals with the VASkey app installed on their devices.

We use your Transaction Notification SMS data to:

1. provide you with the required services.
2. respond to your questions or requests
3. prevent, detect and manage risk against fraud and illegal activities using internal and third party screening tools
4. maintain up-to-date records

5. resolve disputes that may arise, including investigations by law enforcement or regulatory bodies
6. any other purpose that we disclose to you in the course of providing VASkey services to you

4.3 Information that we collect from website visitors

We do not collect your Personal Information when you visit the website. However, so we can monitor and improve our website and services we may collect non-personally-identifiable information. We will not share or disclose this information with third parties except as a necessary part of providing our website and services. We may use the information to target advertisements to you.

4.4 Information that we collect from test users

When you test our services using the "Demo" part of our website, we collect both non-personally identifiable information and personally identifiable information. Information we collect include your IP address, information about your computer, and other standard web log information to monitor the test transactions. We also collect and store your email address and card information you provide to conduct the test transactions. In compliance with the Payment Card Industry Data Security Standard (PCI DSS Requirements"), we implement access control measures, security protocols and standards including the use of encryption and firewall technologies to ensure your card information is safe and secure in our servers, additionally, we implement periodical security updates to ensure that our security infrastructures are in compliance with reasonable industry standards. We will not share and disclose your card information.

4.5 Information that we collect from checkout users

When you checkout with VASkey on a merchant's website, we collect and store your card information, your email address, your mobile phone number, and billing and shipping address. To ensure your card information is kept safe and secure on our servers, we implement access control measures (physical and virtual), security protocols, policies and standards including the use of encryption and firewall technologies in compliance with the PCI DSS Requirements and we implement periodical security updates to ensure that our security infrastructures are in compliance with reasonable industry standards.

We may share your contact information with merchants as part of your purchase details for record purposes. We will not share this information with other third parties except as a necessary part of providing our website and services. We do not share your card information with merchants. Please review your merchant's privacy policy to understand the privacy policies guiding the merchant you transact with.

4.6 Purpose Limitation

VASkey collects Personal Information only for identified purposes and for which consent has been obtained. Such Personal Information cannot be reused for another purpose that is incompatible with the original purpose, except consent is obtained for such purpose

4.7 Data Minimization

VASkey limits Personal Information collection and usage to data that is relevant, adequate, and absolutely necessary for carrying out the purpose for which the data is processed.

VASkey will evaluate whether and to what extent the processing of Personal Information is necessary and where the purpose allows, anonymized data will be used.

5. Two Factor Authentication ("2FA")

2FA is an additional layer of security we have added to your account. When 2FA is enabled, you will be required to enter a One Time Password (OTP) (which is a verification code we have sent to you for authentication purposes), each time you checkout using VASkey on a merchant's website or platform. While we encourage you to enable this feature on every transaction, you may choose to disable the 2FA feature after your initial enrolment by clicking on the toggle button to disable. However, if you choose to disable this feature, you agree that VASkey shall not be liable for any loss or damages incurred as a result of your action.

6. Cookies

We use cookies to identify you as a User and make your user experience easier, customise our services, content and advertising; help you ensure that your account

security is not compromised, mitigate risk and prevent fraud; and to promote trust and safety on our website. Cookies allow our servers to remember IP addresses, date and time of visits, monitor web traffic and prevent fraudulent activities.

Our cookies never store personal or sensitive information; they simply hold a unique random reference to you so that once you visit the site we can recognize who you are and provide certain content to you.

If your browser or browser add-on permits, you have the choice to disable cookies on our website, however this may impact your experience using our website.

7. How We Protect your Information

VASkey shall establish adequate controls in order to protect the integrity and confidentiality of Personal Information, both in digital and physical format and to prevent Personal Information from being accidentally or deliberately compromised.

VASkey is committed to managing your Personal Information in line with global industry best practices. We protect your Personal Information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration, we also use industry recommended security protocols to safeguard your Personal Information. Other security safeguards include but are not limited to data encryption, firewalls, and physical access controls to our building and files and only granting access to Personal Information to only employees who require it to fulfil their job responsibilities. Any Personal Information processing undertaken by an employee who has not been authorized to carry such out as part of their legitimate duties is unauthorized.

Employees may have access to Personal Information only as is appropriate for the type and scope of the task in question and are forbidden to use Personal Information for their own private or commercial purposes or to disclose them to unauthorized persons, or to make them available in any other way.

8. How we share the Personal Information you provide

VASkey does not sell, trade or rent personal information to anyone. However, to enable us render our services to you on our website, we may share your information with trusted third parties, such third parties include financial institutions, payment processors verification services, sanctions screening and identity verification services as well as any

third parties that you have directly authorized to receive your Personal Information. Your Personal Information may be stored in locations outside the direct control of VASkey, for instance, on servers or databases co-located with hosting providers.

We may disclose your Personal Information in compliance with applicable law or a legal obligation to which we are bound.

Please note that merchants, sellers, and other Users you buy from or contract with have their privacy policies, and although VASkey's Merchant Terms of Use does not allow the other transacting party to use your information for anything other than as authorised by you, VASkey is not responsible for their actions, including their information protection practices.

The use of your information by such third party will be subject to their applicable privacy policy, which you should carefully review.

9. Transfer of Personal Information

9.1 Third Party Processor within Ghana

VASkey may engage the services of third parties in order to process the Personal Information of Data Subjects collected by the VASkey. The processing by such third parties shall be governed by a written contract with VASkey to ensure adequate protection and security measures are put in place by the third party for the protection of Personal Information in accordance with the terms of this Privacy Policy.

9.2 Transfer of Personal Information to Foreign Country

Where Personal Information is to be transferred to a country outside Ghana, VASkey shall put adequate measures in place to ensure the security of such Personal Information. In particular, VASkey shall, among other things, confirm whether the country is on the National Information Technology Development Agency ("NITDA") White List of Countries with adequate data protection laws.

Transfer of Personal Information out of Ghana would be in accordance with the provisions of the Ghana Data Protection Regulation. VASkey will therefore only transfer Personal Information out of Ghana on one of the following conditions:

- The consent of the Data Subject has been obtained;

- The transfer is necessary for the performance of a contract between VASkey and the Data Subject or implementation of pre-contractual measures taken at the Data Subject's request;
- The transfer is necessary to conclude a contract between VASkey and a third party in the interest of the Data Subject;
- The transfer is necessary for reason of public interest;
- The transfer is for the establishment, exercise or defense of legal claims;
- The transfer is necessary in order to protect the vital interests of the Data Subjects or other persons, where the Data Subject is physically or legally incapable of giving consent.

VASkey will take all necessary steps to ensure that Personal Information is transmitted in a safe and secure manner. Details of the protection given when your Personal Information is transferred outside Ghana shall be provided to you upon request.

10. Grounds for Processing of Personal Information

Processing of Personal Information by VASkey shall be lawful if at least one of the following applies:

- the Data Subject has given consent to the processing of his/her Personal Information for one or more specific purposes;
- the processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract;
- processing is necessary for compliance with a legal obligation to which VASkey is subject;
- processing is necessary in order to protect the vital interests of the Data Subject or of another natural person; and
- processing is necessary for the performance of a task carried out in the public interest or in exercise of official public mandate vested in VASkey.

For the purpose of this Privacy Policy, consent means any freely given, specific, informed and unambiguous indication of the Data Subject's wishes by which they, through a statement or a clear affirmative action, signify their agreement to the processing of Personal Information relating to them.

11. Choices and Rights

Individuals who have Personal Information held by VASkey are entitled to reach out to VASkey to exercise the following rights:

- Right to request for and access their Personal Information collected and stored. Where data is held electronically in a structured form, such as in a Database, the Data Subject has a right to receive that data in a common electronic format;
- Right to information on their personal information collected and stored;
- Right to objection or request for restriction;
- Right to object to automated decision making;
- Right to request rectification and modification of Personal Information which VASkey keeps;
- Right to request for deletion of their data;
- Right to request the movement of data from VASkey to a third party; this is the right to the portability of data; and
- Right to object to, and to request that VASkey restricts the processing of their information

Your request will be reviewed by VASkey's Data Protection Team and carried out except as restricted by law or VASkey's statutory obligations. You may decline to provide your personal Information when it is requested by VASkey, however, certain services or all the services may be unavailable to you. You may review your account settings and update your Personal Information directly or by contacting us.

12. The Data that We Retain

We will retain your information for as long as your account is active or as needed to provide our services to you, comply with our legal and statutory obligations or verify your information with a financial institution.

VASkey is statutorily obligated to retain the data you provide us with in order to process transactions, ensure settlements, make refunds, identify fraud and in compliance with laws and regulatory guidelines applicable to us, our banking providers and card processors.

Therefore, even after closing your VASkey account, we will retain certain Personal Information and transaction data to comply with these obligations. All Personal Information shall be destroyed by VASkey where possible. For all Personal Data and records obtained, used and stored by VASkey, we shall perform periodic reviews of the data retained to confirm the accuracy, purpose, validity and requirement to retain.

The length of storage of Personal Information shall, amongst other things, be determined by:

- the contract terms agreed between VASkey and the Data Subject or as long as it is needed for the purpose for which it was obtained; or
- whether the transaction or relationship has statutory implication or a required retention period; or
- whether there is an express request for deletion of Personal Data by the Data Subject, provided that such request will only be treated where the Data Subject is not under any investigation which may require VASkey to retain such Personal Data or there is no subsisting contractual arrangement with the Data Subject that would require the processing of the Personal Data; or
- whether VASkey has another lawful basis for retaining that information beyond the period for which it is necessary to serve the original purpose.

13. Contact VASkey's Data Protection Team

If you have any questions relating to this Privacy Policy or would like to find out more about exercising your data protection rights, please reach out to our Data Protection Team via email at privacy@myvaskey.com.

VASkey maintains a data breach procedure in order to deal with incidents concerning Personal Information or practices leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, Personal Information transmitted, stored or otherwise processed. You may contact our Data Protection Team upon becoming aware of any breach of Personal Information or if your access credentials have been compromised, to enable us to take the necessary steps towards ensuring the security of your Personal Information or account.