

**ZOE TRANSFER PRIVACY POLICY** - Last updated: 02/08/2017

Protecting your data, privacy and financial details is very important to us (“Matrix Zoe.ltd”, “us” or “we”).

This policy (together with our Customer Agreement and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand the types of information we collect from you, how we use that information and the circumstances under which we will share it with third parties. By visiting our website (our “Website”) or using a Zoe-Transfer mobile application (“App”) you are accepting and consenting to the practices described in this policy. Unless context otherwise requires, a reference to the Website shall be deemed to also refer to the App.

For the purpose of the relevant data protection legislation, the data controller is Matrix Zoe Ltd.

*INFORMATION WE MAY COLLECT ABOUT YOU*

We may collect and process the following data about you:

**Information you give us:** You may give us information about you by filling in forms on our Website or by corresponding with us by phone, e-mail or otherwise. This includes (but is not limited to) information you provide when you register to use our Website, intention of money transfer using our Website and when you report a problem with our Website. The information you give us may include your name, date of birth, address, e-mail address and phone number, payment reason, personal description, geographic location, photograph, social security number and copies of identification, address proof and other documents.

**Information we collect about you:** With regard to each of your visits to our Website we may automatically collect the following information:

- Details of the intention of money transfers you carry out via our Website, including the geographic location from which the transaction originates;
- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time); what you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

**Information we receive from other sources:** We may receive information about you if you use any of the other websites we operate or the other services we provide. We also may receive information from the banks and other financial institutions you are using to transfer money to us. We are also working closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.

*COOKIES*

Our Website uses cookies to distinguish you from other users of our Website. This helps us to provide you with a good experience when you browse our Website and also allows us to improve our Website. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

#### *USES MADE OF THE INFORMATION*

We use information held about you in the following ways:

• **Information you give to us.** We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us (including the Customer Agreement) and to provide you with the information, products and services that you request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you with information about goods or services we feel may interest you;
- to notify you about changes to our service;
- to ensure that content from our Website is presented in the most effective manner for you and for your computer or mobile device; and
- to comply with legal and regulatory requirements.

**Information we collect about you.** We will use this information:

- to administer our Website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our Website to ensure that content is presented in the most effective manner for you and for your computer or mobile device;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our Website safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and
- to make suggestions and recommendations to you and other users of our Website about goods or services that may interest you or them.

**Information we receive from other sources:** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### *DISCLOSURE OF YOUR INFORMATION*

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We may share your information (Except Bank account details) with selected third parties:

- business partners, suppliers and sub-contractors for the performance of any contract we enter into with them or you in order to improve our Services;
- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;
- Analytics and search engine providers that assist us in the improvement and optimisation of our Services.

We may disclose your personal information to third parties:

- in the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets;
- if Matrix Zoe Ltd or substantially all of its assets or some of them are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets;
- if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the Customer Agreement and any other documents referred to on it; or to protect the rights, property, or safety of Zoe-Transfer.com and Matrix Zoe Ltd, our users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection, investigation in connection with financial crimes or provision of assistance with law enforcement.

We may also show your first name, first initial of your surname and photograph to the recipient of your intention of money transfer, to your peer-to-peer counterparty and disclose these (together with your transaction details) on the transfer map on our webpage to show some recent transfers done through Zoe-Transfer.com as an example.

#### *YOUR RIGHTS*

You have the right to ask us not to process your personal data for marketing purposes by contacting us at [Business.Support@tMatrixZoe.org](mailto:Business.Support@tMatrixZoe.org).

Our Website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

#### *ACCESS TO INFORMATION*

Depending on applicable laws, you may have the right to access information held about you. Your right of access can be exercised in accordance with the relevant data protection legislation. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you.

#### *RESIDENTS OF CALIFORNIA AND VERMONT, USA:*

Other than for our everyday business purposes, we will not share your personal information with non-affiliates or affiliates without first giving you additional privacy choices.

#### *CHANGES TO OUR PRIVACY POLICY*

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

#### *LAW AND JURISDICTION*

This privacy policy and any dispute or claim arising out of the privacy policy is governed by Cote d'Ivoire Law.

Any dispute or claim arising out of or in connection with the privacy policy will be subject to the non-exclusive jurisdiction of the courts of Cote d'Ivoire.

#### *CONTACT*

This policy (together with our Customer Agreement and any other documents referred to in it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand the types of information we collect from you, how we use that information and the circumstances under which we will share it with third parties. By visiting our website (our "Website") or using a Zoe-Transfer mobile application ("App") you are accepting and consenting to the practices described in this policy. Unless context otherwise requires, a reference to the Website shall be deemed to also refer to the App.

For the purpose of the relevant data protection legislation, the data controller is Matrix Zoe LTD.