



## Privacy Policy

Last Updated: 22<sup>nd</sup> May 2023

### Introduction

noqodi is a company duly formed and organized under the rules and regulations of Emirates of Dubai, UAE, under trade license No: 1016410. Thus, noqodi's ( "we" "us" or "our") Privacy Policy (hereinafter referred to as "the Policy") has been devised keeping in view the provisions of the Personal Data Protection Laws of the UAE issued vide Federal Decree-Law No. (45) of 2021 (hereinafter referred to as "the PDPL"). The Policy primarily describes;

- a. what personal information we collect about you,
- b. how and why we collect, store, share or transfer the personal information, and;
- c. how we use the said personal information;

especially when a user access our service channels, like our website and our mobile application for our services (Services).

The Policy will essentially explain the objective and purpose of collecting and storing the personal information and how we handle personally identifiable information collected from customers/ merchants who register for noqodi, a payment gateway services online or by submitting a physical application form.

As the services offered by noqodi evolve constantly, we reserve the right to amend this Privacy Policy from time to time. We request you to check this link on regular basis to get information. We will post a revised version of the Policy on our website anytime which will be effective from the time it is updated online.

We want to assure you that noqodi is committed to maintaining the;

- a. confidentiality,
- b. integrity,
- c. security and;
- d. safety of any Personal Information about our users.

To achieve the above objectives, noqodi shall implement relevant security measures as explained in the ‘security’ section of the Policy.

It is not mandatory for you to provide the Personal Information that we have requested, but, if you choose not to do so, unfortunately, we will not be able to provide you with our Services through the noqodi channels. If you have any further questions, comments, concerns or feedback regarding the Policy or any other privacy concern, please contact us at <https://www.noqodi.com/#/contact-us>

## **Consent**

By registering, accessing or using our Services including visiting our site or mobile apps, you agree and confirm that you accept the requirements, policies and practices provided in this Privacy Policy and you strictly acknowledge and adhere to practices, requirements, and/or policies outlined in this Privacy Policy which may from time to time be amended. In addition, by accepting the Policy and the User Agreement in registration, you expressly consent to our collection, storage, use and disclosure of your personal information as described in this Privacy Policy.

## **Purpose**

Our primary purpose in collecting personal information is to provide you with a safe, smooth, efficient, and customized experience. You agree that we may use your personal information to:

- Provide customers notice of our information practices;
- Offer consumer choices as to how their information is used beyond the purpose for which the information was provided;
- Offer consumers reasonable access to their information and an opportunity to correct inaccuracies;
- Take reasonable steps to protect the security and integrity of personal information;
- Customer support you request;
- Resolve disputes, collect fees, and troubleshoot problems.

## **Collection**

Personal data includes information that we collect and process about you depending on the products or services you obtain or receive. Typically, we process the following information:

- **Log-in:** information in connection with our account sign-in facilities, including your log-in, username and encrypted password details.
- **Personal Details:** title, name, nationality, photograph, date and place of birth.
- **Contact:** email address, contact telephone number , residential or business address.
- **Identity:** Emirates ID number, passport and similar identification documentation.
- **Financial Information:** your bank account number, credit or debit card numbers.
- **Economic, Financial and Residency Information:** income and other revenues, the value of your assets and your country of residence.
- **Employment Related Data:** employment, employer's name and remuneration.
- **Transactional Information:** details about payments to and from your accounts including beneficiary names, account numbers, addresses and transaction details.
- **Payment Information:** we may collect Personal Information about the purchase or transaction. This includes your payment Personal Information, such as your credit or debit card number other card related Personal Information, and other account and authentication related Personal Information, as well as billing, shipping and contact details.
- **Correspondence:** community discussions, chats, dispute resolution, correspondence through our sites, by phone, email, online or otherwise.
- **Marketing:** details of any marketing preferences we receive from you.
- **Sensitive Information:** fingerprints or facial recognition which can be used for identification and security purposes.
- **Technical Information:** We also collect other information when you use our website or app including your IP address and device ID, geographic location, , statistics on page views, traffic to and from the sites, ad data, and standard web log information;
- **Additional information:** The above information does not purport to be exhaustive and only provides the common personal information that will be collected from you. As such, any other additional information which is similar to above or required for security purposes and completion of the transaction.
- We may only be able to collect your Personal Information if you voluntarily provided said information to us. We note that if you wish to opt out or do not provide any of the Personal Information, we will not be able to process the required transactions. In such a situation, we will not be in a position to continue to provide you access and use of our website for the Services.

## Marketing

- a. We may use your Personal Information to send you marketing communications, communicate with you about our Services and let you know about our policies and terms.
- b. We also use your Personal Information to respond to you when you contact us.

- c. We don't sell or rent your personal information to third parties for their marketing purposes without your explicit consent.
- d. We may combine your information with information we collect from other companies and use it to improve and personalize our services, content and advertising.

## **Sharing**

noqodi reserves the right (and you authorize noqodi) to share or disclose your Personal Information when noqodi determines, in its sole discretion, that the disclosure of such Personal Information is necessary or appropriate:

- To enable smooth, improved and faster access, operation, management, administration of the Services;
- To verify and carry out transactions;
- To notify, contact or communicate with you of any issues and other related concerns about the Services;
- To enforce our rights against you or in connection with a breach by you of this Privacy Policy or the terms and conditions to access the Services;
- To prevent prohibited or illegal activities; or
- When required by law whether national or international, legal process, litigation, and/or requests from public and governmental authorities within or outside your country of residence or if we determine that for purposes of national security, law enforcement, or other issues of public importance, disclosure is necessary or appropriate.

We may also share your personal information with:

- Service providers under contract who help with our business operations (such as fraud investigations, bill collection, affiliate and rewards programs and cobranded credit cards).
- Providers of payment-processing services and other businesses that help us process your payments;
- Other third parties to whom you explicitly ask us to send your information (or about whom you are otherwise explicitly notified and consent to when using a specific service).
- Law enforcement authorities, government bodies, courts, dispute resolution bodies, regulators, auditors and any party appointed by our regulators to carry out investigations or audits of our activities; and
- where required to do so by court order or where we are under a duty to disclose or share your information in order to comply with (and/or where we believe we are under a duty to comply with) any legal obligation; and;

- In the event of any merger or acquisition of noqodi with its affiliates or with any new entity, transfer of data including Personal Information data of users is also transferred. However, in any such transfer of business, maintaining privacy, security and safety of the personal information data shall be given foremost importance.

## **Account Protection**

Your password is the key to your account. Use unique numbers and letters, and do not disclose your noqodi password to anyone. You are responsible for keeping your Login ID, Password, Mobile Device, and Email Account safe and confidential. If you do share your password or your personal information with others, remember that you are responsible for all actions taken in the name of your account. If you lose control of your password, you may lose substantial control over your personal information and may be subject to legally binding actions taken on your behalf. Therefore, if your account credentials or OTP (one time password) has been compromised for any reason, you should immediately notify noqodi and change your password. If your email address or your mobile device changes, you are responsible for informing us of that change. We are not responsible if someone else accesses your account through Registration Information they have obtained from you or through a violation by you of this Privacy Policy or the Terms of Use.

Also, in compliance with the provisions of Article 21 of the PDPL, noqodi, as an added protection mechanism, undertakes to conduct Data Protection Impact Assessment (DPIA) prior to the processing of the information that involves new technologies.

We implement security measures to ensure protection of your Personal information and we adhere to the applicable laws, rules and regulations in relation to the collection, retention and protection of data privacy.

## **Closure of account**

When you request us to close your e-wallet for the service, access to your account will not be possible and we will delete all account credentials. However, portions of your Personal Information, may remain on our production servers indefinitely. We reserve the right to use this aggregate data to improve our service and for other lawful purposes. Your data may also remain on a backup server but will be removed within a commercially reasonable period. Also, please note that we also may need to store your data as required by federal, state or local law or by our regulators or to defend ourselves in any lawsuit brought by yourself or any third-party.

In case your Personal Information is required to be disclosed under an order of a court, regulatory, tax, law enforcement, governmental and/or judicial authority or under any law, you agree and acknowledge that we have the right to disclose of your Personal Information for meeting such an order. You therefore agree not to take any action and/or waive your rights to take any action against us including our affiliates for the disclosure of your Personal Information in these circumstances

## **Accessing, Reviewing and Changing Your Personal Information**

You can see, review and change most of your personal information by signing on to noqodi. It is your responsibility to keep your Personal Information up to date by updating your profile on the noqodi App / Web. We are not responsible for costs or other issues arising from you not keeping your Personal Information up to date.

## **Security**

We assure you that noqodi provides utmost level of security measures towards processing of the information in compliance with the provisions of the PDPL. As required by the said law, noqodi shall provide for;

- a. encryption of the data;
- b. information identifying the subject shall be relaced with pseudonyms or other covered coding. This is also in line with the European Union's (EU) General Data Protection Regulations (GDPR).

We may transfer your personal data to other countries where our service providers maintain operations. When we do this, we'll ensure it has an appropriate level of protection and that the transfer is lawful. This includes using standard contractual clauses for transfers of personal data.

noqodi offer industry-standard practices and security measures to safeguard and secure the Personal Information we collect. However, noqodi shall not be liable for any breach of security measures or for hacking which is beyond our reasonable control.

## **Third Parties**

Any partners we work with have been selected in accordance with our security policies and practices and are bound by confidentiality obligations. They may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations. Except as otherwise expressly included in this Policy, this document addresses only the use and disclosure of information we collect from you. If you disclose your information to others,

whether they are bidders, buyers or sellers on our sites or other sites throughout the internet, different rules may apply to their use or disclosure of the information you disclose to them. noqodi does not control the privacy policies of third parties, and you are subject to the privacy policies of those third parties where applicable. We encourage you to ask questions before you disclose your personal information to others.

## **General**

We may amend the Policy at any time by posting the amended terms on this site. All amended terms automatically take effect from the day they are posted on the site. In addition, we will notify you through email for any changes in this policy.