PRIVACY POLICY

Last updated: 29 November 2024

References in this Policy to “Mediacube”, “we”, “our” or “us”, are to MEDIACUBE WORLDWIDE LTD and references to “you”, “your”, “customer” or “user” are to the person who is a user of the mobile applications and web-services (the “App”).

The App includes:

mcpay.io (and the sub-level domains and APIs)

MC Pay application (and the sub-level APIs)

and other websites and applications developed before the date of entry of this Privacy Plicy into force and afterwards.

This Privacy Policy explains how your personal data is collected and processed by us when you use the App.

If you have any questions, please feel free to contact us at: support@mcpay.io

We update this Privacy Policy from time to time. If we make changes, we will notify you by revising the date at the top of the policy and, depending on the specific changes, we will provide you with additional notice or require a renewed consent.

By accessing or registration at the App, downloading mobile or desktop device-based applications from us you signify acceptance to the terms of this Privacy Policy. Where we require your consent to process your personal information, we will ask for your consent to the collection, use, and disclosure of your personal information as described further below.

IF YOU DO NOT AGREE WITH THIS POLICY PLEASE LEAVE THE APP, UNINSTALL OUR APPLICATIONS AND CEASE USING RELATED SERVICES IMMEDIATELY.

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2. Our Status

a. We will act as a data controller in relation to personal information about you that may be either provided by you or collected by us.

b. As a data controller, we will solely determine the purposes and means of the processing of your personal information.

3. How We Use Your Personal Information

a. In this Section 1 we have set out:

i. the general categories of personal information that we may process;

ii. the purposes for which we may process personal information; and

iii. the legal basis of the processing.

b. Please note that not all the information you provide to us is personally identifiable information according to the applicable law in force. By registering at the App you will provide and share your personal information with the public and with other users. Information you provided to the public sections of the App or of your profile can be seen by anyone. This personal information is made available to the public to help you connect other users and/or use the App and our services. Please be advised that public personal information can be shown up when someone does a search on the App or another search engine. **Please be aware that people you share your personal information or communicate with may download or copy the information you provided to them or make it public**. Use caution about the personal information you share with others.

c. It is your sole decision whether to provide us with the requested information or not. However, if you choose to withhold requested information, we may not be able to create an Account for you at the App or provide you with the possibility to use related services. Depending upon the activity, some of the information that we ask you to provide is identified as mandatory and some as optional. Please do not supply any other person’s personal information to us, unless we prompt you to do so.

d. **Usage Data.** We may process information about your use of the App ("usage data"). The usage data may include:

i. your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and navigation paths, as well as information about the timing, frequency and pattern of your use;

ii. your device number, device id or unique identifier, device type, and unique device token, operating system and applications used, application crash-data, application version, device identifiers such as IDFA (Identifier For Advertisers), Android ID (Android device), referrer URL (Playstore), Google Advertiser ID, device model;

iii. cookies, local storage files.

The source of the usage data is our analytics tracking system and your usage of the App. This usage data may be processed for the purposes of analysing the use of the App and to keep you signed in at the App. The legal basis for this processing is your consent and our legitimate interest, namely monitoring and improving the App and our services.

e. **Account data.** We may process your account data ("account data"). The account data may include your name, nickname (or username), phone number, email address, profile photo, social media identifiers, profile information.

The source of the account data is you. The account data may be processed for the purposes of providing you access to our services, ensuring the security of the App, our services and communicating with you. The legal basis for this processing is a performance of agreements between you and us and/or taking steps, at your request, to enter into such agreements.

f. **Customer relationship data.** We may process information contained in or relating to any communication that you send to us, or relating to our customer relationships with you ("customer relationship data"). The customer relationship data may include your name, your nickname (or username), your contact details (phone number, social media identifier, email address or messengers identifiers you use to communicate with us) and information contained in communications between us and you.

The source of the customer relationship data is you. The customer relationship data may be processed for the purposes of managing our relationships with customers, communicating with customers, customer support, quality assurance of our customer support and communication with customers, keeping records of those communications and promoting our products and services to customers. The legal basis for this processing is a performance of an agreement between you and us and/or taking steps, at your request, to enter into such an agreement and our legitimate interest, namely the proper management of our customer relationships and administration of the App.

g. **Verification data.** We may process information when we verify your identity ("verification data"). The verification data may include your name, address, telephone number, e-mail address, date of birth, national identification number, government identification documents, and, if applicable, information regarding your bank account (such as the name of the bank, SWIFT or the bank code, and account number) and other payment/ electronic money /crypto institution account or wallets. Also, this verification data may include your driving license or any other national ID, internal or international passport, bank statement, utility bill, tax document and/or other documents that we consider necessary for your identification. We may request from you video identification or your selfie with a specified ID or passport.

The source of this data is you. This verification data may be processed for the purposes of identity verification and the detection of money laundering, terrorist financing, fraud, or any other financial crime, and/or performance our obligations to verify the identity of our customers. The legal basis for this processing is the compliance with our legal obligation, the protection and assertion of our legal rights, your legal rights and the legal rights of others, the performance of a contract between you and us and/or taking steps, at your request, to enter into such a contract.

Please note that by accepting this Privacy Policy you explicitly accept using your phone number to send verification codes to Telegram messenger. To provide this service, we share your telephone number with our third-party provider Telegram Messenger Inc. Privacy Policy of Telegram Messenger Inc. is located at: https://telegram.org/privacy.

Any data shared is solely for the purpose of sending verification codes and is handled in compliance with our privacy standards. You have the right to opt out of receiving verification messages via Telegram messenger at any time by contacting us by support@mcpay.io.

h. **Sensitive Data.** We do not require you to provide us with personal information revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or sexual orientation ("sensitive data"). If you decide to provide us, the App users or any third party with and/or allow your sensitive data to be publicly viewed through your profile, it should be your voluntary decision taken solely by you. We additionally inform you that information that is public can be seen by anyone and people you share and communicate with may download or copy the content or information you provided to them or make it public. Use caution about the personal information you share with others.

i. **Other sources of information.** If you log into the App using a third party site or platform such as Facebook, Apple and Google, we access information about you from that site or platform, in accordance with the authorization procedures determined by such a third party site or platform provided that you have given the third party site in question such consent.

You can learn more about how such third-party sites or platforms process your personal data in the relevant privacy policy:

- Facebook: https://www.facebook.com/about/privacy/
- Google: https://policies.google.com/privacy?hl=en-US
- Apple: https://www.apple.com/legal/privacy/en-ww/

If you log into the App using a third party site or platform, you represent and warrant that (i) your access and use of such features in connection with the App will comply with the applicable terms and policies of such site or platform; and (ii) that you are over the minimum age limit that is prescribed for such third party site or platform by the legislation in the individual jurisdictions.

j. **Analytical information.** We may process information when you connect your YouTube channel or Facebook page ("analytical information"). The verification data may include your Google account information, Facebook account information, YouTube account information, views and subscribers data of your YouTube channel, the amount of income from your YouTube channel, the amount of income from your Facebook page, and other analytical YouTube and Facebook information.

The source of the analytical relationship data is you and such platforms. The analytical data may be processed for the purposes of managing our relationships with you and providing our services. The legal basis for this processing is a performance of agreements between you and us and/or taking steps, at your request, to enter into such an agreement and our legitimate interest, namely the proper management of our relationships and administration of the App.

k. We may process any of your personal information identified in this Policy where necessary for the purposes of managing risks or obtaining professional advice. The legal basis for this processing is our legitimate interest, namely the proper protection of our business against risks.

l. We may process any of your personal information identified in this Policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure, or for detecting, preventing and addressing fraud and other illegal activity. The legal basis for this processing is our legitimate interest, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.

m. In addition to the specific purposes for which we may process your personal information, we may also process any of your personal information where such processing is necessary for compliance with a legal obligation to which we are subject, or in order to protect your vital interests or the vital interests of another individual.

4. Limited Use Policy

a. When you submit a request to connect your YouTube channel to Mediacube, the App may use and transfer in accordance with this Policy of information received from Google APIs that adhere to Google API Services User Data Policy, including the Limited Use requirements.

b. Any transfer of your data will be solely for the following purposes:

i. to provide or improve your appropriate access or user-facing features that are visible and prominent in the requesting application's user interface and only with the user's consent;

ii. for security purposes (for example, investigating abuse);

iii. to comply with applicable laws; or,

iv. as part of a merger, acquisition, or sale our assets after obtaining explicit prior consent from you.

c. We are committed to monitoring any changes to Google's API Services User Data Policy, including the Limited Use requirements, and comply with it.

5. How We Use Your Personal Information for Marketing

a. We may process your personal information identified in this Policy to keep you informed about our new products, product upgrades, special offers, webinars, events and promotions that may be of interest to you, to send you updates regarding services you have shown interest in or provide further information related to the topic you requested, or to get your consent to further contacting you regarding any other services you might be interested in. The legal basis for this processing is our legitimate interest, namely the development and conducting of our business.

b. We may use your personal information to send you promotional emails and/or newsletters when you have consented to receive such communications. The legal basis for this processing is your consent to receive promotional communications from us.

c. We may use aggregate, non-identifying statistical data for statistical analysis, marketing, or similar promotional purposes to help improve our offerings to you or to improve your browsing experience.

6. Cookies

a. As with many other websites in the world, the App uses cookies. A cookie is a small file on your device with a string of letters and numbers which serves as a unique identifier. Sometimes cookies can also be used to store your personal preferences on websites. When you open the App for the first time, cookies are created on your device. When you open it next time, cookies are sent back to us, thus letting us know you've already been there. We don't create cookies ourselves, but we use third-party providers who do it for us.

b. Cookies make it easier for you to use the App during future visits. They also allow us to monitor traffic and personalise the content of the App for you. *Session-based cookies* only last while your browser is open, and are automatically deleted when you close the browser. *Persistent cookies* last until you or your browser deletes them or until they expire.

c. Some of our cookies are necessary for certain uses of the App. These cookies allow us to make the App usable by enabling basic functions like page navigation. The App may not function properly without these cookies.

d. We may also use functional cookies and cookies from third parties for analysis and marketing purposes. *Functional cookies* enable certain parts of the App to work properly and your user preferences to remain known. *Analytics cookies*, among other things, collect information on how visitors use the App, the content and products that users view most frequently, and the effectiveness of our third-party advertising.

e. We generally use cookies for the following purposes:

i. authentication – we use cookies to identify you when you visit the App and as you navigate through the App;

ii. status – we use cookies to help us to determine if you are logged into the App;

iii. security – we use cookies as an element of the security measures used to protect user Accounts, including preventing fraudulent use of login credentials, and to protect the App and our services generally;

iv. analysis – we use cookies to help us to analyse the use and performance of the App and services; and

v. cookie consent – we use cookies to store your preferences in relation to the use of cookies more generally.

f. We use analytics packages from trusted third parties to constantly improve your experience of using the App and related services. Our trusted partners help us serve advertising and/or analytics and may place cookies on your device. Please read their privacy policies to ensure that you are comfortable with the manner in which they use cookies.

g. We use the following third-party services to monitor and analyse web traffic and user behaviour:

i. Amplitude. Amplitude is a web analysis service provided by Amplitude Inc. The service is subject to Amplitude's Privacy Policy: https://amplitude.com/privacy

ii. Firebase. Firebase is a web analysis service provided by Google Inc. The service is subject to Google's Privacy Policy:https://policies.google.com/privacy

iii. Facebook. Facebook is a web analysis service provided by Meta Inc. The service is subject to Amplitude's Privacy Policy: https://www.facebook.com/privacy/policy

While we do our best to keep this list updated, please note that third parties who place cookies on your device may change from time to time, and there may be a slight delay updating the list.

h. You can generally activate or later deactivate the use of cookies through a functionality built into your web browser or mobile device. To learn more about how to control cookie settings through your browser:

Firefox https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences

Chrome https://support.google.com/chrome/answer/95647?hl=en

Internet Explorer https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies

Safari (Desktop) https://support.apple.com/kb/PH5042?locale=en_US

Safari (Mobile) https://support.apple.com/en-us/HT201265

Android Browser http://support.google.com/ics/nexus/bin/answer.py?hl=en&answer=2425067

For other browsers, please consult the documentation that your browser developer provides.

You can opt out of interest-based targeting provided by participating ad servers through the Digital Advertising Alliance. Please consult http://www.aboutads.info/ for more information.

7. Storage Files

a. We may use local storage files to keep you signed in at the App if you choose so. You can delete local storage files from your device at any time by visiting your device's settings.

b. Local storage, including Javascript-enabled localStorage, is a typical way for a website to store a small file of letters and numbers in your browser. We use local storage files to keep you signed in at the App and to keep your account authorisation settings. Local storage files are deleted when the website that stored them deletes them. You can also delete local storage files from your browser at any time you like by visiting your web browser settings.

c. You can clear local storage files from your browser by taking the following actions:

i. In Firefox, localStorage is cleared when the following conditions are met: (a) user clears recent history, (b) cookies are selected to be cleared, and (c) time range is "Everything";

ii. In Chrome, localStorage is cleared when the following conditions are met: (a) clear browsing data, (b) "cookies and other site data" is selected, and (c) timeframe is "from beginning of time." In Chrome, it is also now possible to delete localStorage for one specific site;

iii. In Internet Explorer, to clear localStorage: (a) click on Tools–Internet Options, (b) General tab, (c) delete browsing history on exit, (d) ensure “Cookies and website data” (or “temporary internet files and website files”) is selected, and (e) consider unchecking "Preserve Favorites website data" at the top;

iv. In Safari, to clear localStorage: (a) click Safari, (b) then click preferences, (c) select the Privacy tab, (d) click Remove all website data and (e) click Remove Now.

8. General Processing

a. Our processing means any operation or set of operations which is performed on personal information, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction, support, maintenance, etc. We do not make automated decisions, including profiling. The processing of personal information is carried out using computers and/or IT enabled tools, following organisational procedures and modes strictly related to the purposes indicated.

b. Your personal information is processed at our operating offices and in any other place where the parties involved with the processing are located.

c. We will store your personal data for as long as necessary in order to provide you with the App or otherwise fulfil the purposes as described above, unless further storage is required in order to establish, exercise or defend a legal claim or to comply with applicable law, including accounting rules.

d. Your personal data are deleted or anonymized as soon as it no longer serves one of the above mentioned purposes and in any event no later than three (3) years after your interaction with us has ceased.

e. We have implemented measures designed to secure your personal information from accidental loss and unauthorised access, use, alteration, and disclosure.

f. Your personal information is stored on cloud services provided by Digital Ocean. Digital Ocean Privacy Policy is available at: https://www.digitalocean.com/legal/privacy-policy

9. Disclosing Your Personal Information

a. We may disclose your personal information to our affiliates, our contractors and our service providers insofar as reasonably necessary for the purposes, and on the legal bases, set out in this Policy. For example, we may share your personal information with our service providers who perform identity verification of users, however, in some cases you may directly interact with such service providers and they will act as data controllers in relation to the personal information you provide to them directly.

b. Your personal information may be accessible to certain types of our employees or contractors, involved with the operation of the App (customer support, marketing, moderation, compliance, legal, system administration) or external parties (such as third party technical service providers, identity verification service providers, hosting providers, software development service providers, communication agencies) appointed, if necessary, as data processors by us.

c. We also have relationships with partners or vendors that provide features and services directly to you when you use the App. For example, when processing a payment to you, or when require you to verify your identity directly with our identity verification partners. In these cases, such a partner is not acting as a service provider to us and is transacting with you directly. The data passed to them is the information necessary to facilitate the type of service they provide directly to you.

d. In addition to the specific disclosures of personal information, we may disclose your personal information where such disclosure is necessary (i) for performance of a task carried out in the public interest or in the exercise of official authority or in response to a subpoena, court order, or other legal mechanisms, or (ii) in order to protect your vital interests or the vital interests of another natural person. We may disclose your personal information to our professional advisers insofar as reasonably necessary for the purposes of managing risks, obtaining professional advice, or the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure or detecting, preventing and addressing fraud and other illegal activity.

e. If we transfer your personal information outside the EEA zone, UK or Switzerland, we will ensure an adequate level of protection by any of the recognised methods of transfer, including but not limited to entry into the standard contractual clauses for the transfer of personal information to processors established in third countries.

f. The recipients' use of the disclosed information will not be covered by this Privacy Policy. If you have questions concerning the processing carried out by such third parties, you should review privacy policy of the Payment Providers and other partners specified in MC Pay.

10. Social sharing features

a. The App offers or can offer social sharing features and other integrated tools (such as the Facebook “Like” button), which let you share actions you take in the App with other media. It is necessary to comply with the age restrictions established by the applicable regulation of the relevant media and in the country of your residence to use MC Pay. The use of such features enables the sharing of information with your friends or the public, depending on the settings you establish with the entity that provides the social sharing feature.

11. Security

a. We take reasonable measures to help protect information about you from loss, theft, misuse and unauthorized access, disclosure, alteration and destruction.

b. We do not, and will not, provide your personal data in direct exchange for money. Therefore, in the literal sense, We do not sell your data. However, we have disclosed some categories of personal data we collect, explained under "Sharing of information", to third parties for business purposes as explained under "Use of information – purpose and legal basis".

c. To the extent this practice is interpreted to constitute a "sale" under the CCPA or GDPR, please contact us at support@mcpay.io to exercise your right to withdraw your consent on sharing your personal data with third parties.

d. The App may contain links to any other websites or services. Please note that we are not responsible for the privacy practices or the content of such websites or services, and you should review the privacy policy of each such website or service to make sure you are comfortable with it before providing any personal information.

12. Push notifications

a. We send push notifications or alerts to your mobile device to provide App-related information, service updates, promotional communications and other related messages, if you have agreed to such notifications. You can deactivate these notifications by changing your notification settings on your device.

13. Your Rights

As a data subject (a person whose personal information is collected, stored and processed) you have the following rights under data privacy laws:

a. **Right of access.** You have the right to obtain confirmation if your personal information is being processed by us. If that is the case, you can access your personal information and the following information: (i) the purposes of the processing; (ii) the categories of personal information; (iii) to whom the personal information has been or will be disclosed; (iv) the envisaged period for which the personal information will be stored, or the criteria used to determine that period.

If you would like to have a copy of your personal information from us, we will provide it if (i) you prove your identity, (ii) it will not adversely affect the rights and freedoms of others. The first copy will be provided for free, for any further copies we may charge a reasonable fee based on administrative costs.

b. **Right to rectification**. You have the right to demand that we correct without undue delay your personal information which we have in our systems if it is inaccurate or incomplete.

c. **Right to erasure ("right to be forgotten").** You have the right to demand that we erase your personal information, and we shall erase it without undue delay where one of the following grounds applies: (i) this personal information is no longer necessary in relation to the purposes for which it was processed; (ii) you withdraw consent on which the processing is based, and where there is no other legal ground for the processing; (iii) you object to the processing and there are no overriding legitimate grounds; (iv) your personal information has been unlawfully processed; (v) your personal information has to be erased for compliance with a legal obligation.

d. **Right to restrict processing.** You have the right to restrict us in the ability of processing your information where one of the following applies: (i) you contest the accuracy of your personal information and we are verifying it; (ii) the processing is unlawful and you want to restrict it instead of erasure; (iii) we no longer need your personal information, but you need it for establishment, exercise or defense of legal claims; (iv) you have objected to processing and we are verifying whether legitimate grounds override your request.

e. **Right to data portability.** You have the right to receive your personal information which you provided to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another company, where: (i) the processing is based on your consent or on a contract; and (ii) the processing is carried out by automated means.

Where technically feasible, you can demand that we transmit those data directly to another company.

f. **Right to object.** You have the right to object to the processing of your personal information based on our legitimate interests. We shall no longer process your personal information unless we demonstrate compelling legitimate grounds for the processing or for the establishment, exercise or defense of legal claims.

Where personal information is processed for direct marketing purposes, you have the right to object at any time to the processing of your personal information for such marketing.

g. **Right to withdraw consent.** You have the right to withdraw your consent for processing of your personal information at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

14. Changes to this Privacy Policy

a. We may modify this Privacy Policy by providing notice of such changes, such as by sending you an email, providing notice through the App or updating the "Last Updated" date at the bottom of this Privacy Policy. By continuing to access or use of the App, you confirm your agreement to the modified Privacy Policy. If you do not agree to any modification to this Privacy Policy, you must stop using the App and related services, and delete our applications from your devices. We encourage you to review the Privacy Policy periodically to ensure you are fully aware the terms and conditions that apply to your access to, and use of, the App and related services.

15. Contact details

a. If you have any requests concerning your personal information or any queries with regard to this Privacy Policy please feel free to contact us at support@mcpay.io or our mailing address below:

MEDIACUBE WORLDWIDE LTD

Makariou III, 134, ground floor, 3021, Limassol, Cyprus

HE 401840

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