

Privacy and Cookies Policy

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1. Introduction

1.1 In order to be able to make NPayout's services available to you in compliance with the obligations imposed by Applicable Law and by regulatory authorities, NPayout must ask you for certain information about yourself, including financial information (e.g., information about your identity, ecommerce sales, beneficiary account, etc.). NPayout will utilize the data provided by you in accordance with applicable provisions of governing data protection laws. The information obtained shall, as a matter of principle, be used by NPayout solely for providing NPayout Services and solely to the extent necessary to render such services. The information about you which we store shall, as a matter of principle, not be made accessible to third parties unless we are obligated to do so by law or due to legal ordinances or in order to properly render our services to you.

1.2 This Policy applies to any user of products, services, technologies or functionalities offered by us anywhere in the world (and, when such user is a business entity, to any individual who is the owner of, or who acts on behalf of, such user), and to any visitor to our website, mobile app, or other channel.

2. How we collect information

2.1 Collected from Visitors NPayout automatically collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. NPayout's purpose in collecting non-personally identifying information is to better understand how NPayout's visitors use its website, mobile app or other channel through cookies, web beacons, log files and other technologies:

- a. Your domain name, your browser type and operating system, web pages you view, links you click;
- b. Your IP address, the length of time you visit our website, mobile app or other channel, or use our Services, your activities on our website, mobile app or other channel, and the referring URL or the webpage that led you to our website.

Please see Section 8 "Cookies" below for more information. Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from being able to use NPayout's services.

2.2 Provided by Users You may provide us data about you by filling in forms on our website, mobile app or other channel(e.g. NPayout Account Registration), or by corresponding with us (for example, by e-mail or telephone). The data you provide may include data about additional persons that are beneficial

owners of the NPayout Services. This includes that is provided to us about you:

- a. upon registration for a NPayout Account;
- b. when you log in to your NPayout Account;
- c. when you submit any Settlement Orders through your NPayout Account;
- d. when entering a competition, promotion or survey; and
- e. when a problem is reported or a request for support is received.

Visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from being able to use NPayout's services.

3. Information we collect

3.1 We collect the Personal Information you provide directly to us when you apply for a NPayout Account, perform any transactions on the NPayout platform, or use other NPayout Services. This may include:

- a. Your contact information (e.g., name, email address, phone number, billing or mailing address)
- b. Bank and credit account information
- c. IP address
- d. Identity validation (e.g., photograph, other information requested to verify your information, including copy of valid ID document)
- e. Publicly available and/or criminal history
- f. National identification numbers
- g. Nationality
- h. Date and place of birth
- i. Details of any transactions carried out using any the services
- j. Any other information that you choose to provide to us (e.g., if you send us an email/otherwise contact us)
- k. Calls/emails/other correspondence
- l. Information through Cookies and other tracking technologies as listed above and as described in the section below entitled "Cookies"

You are responsible for providing accurate and up-to-date information.

3.2 If you are required to provide information about shareholders or beneficial owners of your business, you acknowledge that you have that person's consent to provide his/her information to us. This may include:

- a. Contact information, such as name, home address, and email address.
- b. Account information, such as username and password.
- c. Financial information, such as bank account numbers, bank statement, and trading information.
- d. Identity verification information, such as images of your government issued ID, passport, national ID card, or driving license. Note: US residents may be asked to provide their social security numbers.
- e. Residence verification information, such as Utility bill details or similar information.

3.3 We may collect and process Personal Data about Buyers or third parties related to your business in providing NPayout Services.

You are responsible for making sure that the privacy rights of any third parties, including Buyers and other individuals related to your business, are respected, including ensuring appropriate disclosures about third party data collection and use; with respect to such data you hereby are deemed to be and accept to be controller. To the extent that we are acting as your data processor, we will process Personal Data in accordance with the terms of our agreement with you and your lawful instructions.

4. How and Why we use your data

4.1 We will only use your Personal Information to:

- a. Validate your identity (including via SMS or Voice Call, as applicable) when you associate with our services.
- b. Process your transactions, including transfers into the Peoples Republic of China in accordance with State Administration of Foreign Exchange regulations
- c. Perform the required controls and checks in accordance with money laundering/terrorist financing and know your customer requirements under Applicable Law, and internal control policies, and well as address other law enforcement needs as more fully described in our Terms and Conditions.
- d. Analyze NPayout website, mobile app or other channel usage, and improve our website mobile app or other channel usage and their offerings.
- e. Help us respond to your customer service requests and support needs.
- f. To tailor the content and information that we send or display to you, to offer location customization (where permitted by applicable law), personalized help and instructions, and to otherwise personalize your experiences while using our website, mobile app, and other channels, and/or our services, such as developing and offering you with new and/or additional services to the services we are providing you or new and/or additional features to existing services, based, where appropriate, on your eligibility for such new and/or additional services or features, as would be evaluated by us from time to time.
- g. Contact you about NPayout Services. The email address you provide may be used to communicate information and updates related to your use of the NPayout Services. We may also occasionally communicate company news, updates, promotions, and related information relating to similar products and services provided by NPayout.
- h. Better understand how users, access and use our website, mobile app, and other channels and/or our services, both on an aggregated and individualized basis, to administer, monitor, and improve our website , mobile app, and other channels, and/or services, for our internal purposes,

and for other research and analytical purposes (including in the form of our online surveys).

- i. Administer a contest, promotion, survey or other site feature as will be more explained on the website.

5. Disclosure of personal information

NPayout discloses potentially personally-identifying and personally-identifying information only (a) to legal and regulatory authorities as required by Applicable Law, and (b) to those of its employees, service providers and affiliated organizations that (i) need to know that information in order to process it or to provide services, and (ii) that have agreed not to disclose it to others, as described below.

5.1 Disclosure to Third Parties

In processing your transactions, we may share some of your Personal Information with Service Providers who help with our business operations. Your information will not be sold, exchanged, or shared with any third parties without your consent, except to provide NPayout Services or as required by law. By using our Services and accepting our Terms and Conditions, you consent to the disclosure of your Personal Information as described in this Privacy Policy.

NPayout's Service Providers are contractually bound to protect and use such information only for the purposes for which it was disclosed, except as otherwise required or permitted by law. We ensure that such third parties will be bound by terms no less protective those described in this Privacy Policy, or those we are subject to under applicable data protection laws, including but not limited to the Applicable Law.

5.2 Disclosure to Legal Authorities

We may share your Personal Information with law enforcement, data protection authorities, government officials, and other authorities when:

- a. Compelled by subpoena, court order, or other legal procedure.
- b. We believe that the disclosure is necessary to prevent physical harm or financial loss.
- c. Disclosure is necessary to report suspected illegal activity.
- d. Disclosure is necessary to investigate violations of this Privacy Policy or our Service Agreement.

6. Transfer and storage of data

6.1 Our services are global and data may be stored and processed in any country where we have operations or where we engage service providers. Data we collect may be transferred to and/or stored at a destination outside your country of residence or the Account Jurisdiction, which may have data protection rules that are different from those of your country, including transferring data to and from regulatory authorities, or to staff operating outside the country who process data on our behalf or for one of our suppliers. Staff

may be engaged in the fulfilment of your request and the provision of support services. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your data remains protected to the standards described in this privacy policy. By submitting the data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that the data is treated securely and in accordance with this Privacy Policy and the relevant data protection regulations.

7. Protection of Certain Personally-Identifying Information

7.1 NPayout takes all organizational and technical measures appropriate to protect against the unauthorized access, use, alteration or destruction of potentially personally- identifying and personallyidentifying information.

7.2 All data that you provide to us is stored on our secure servers. You are responsible for keeping your account credentials safe and secure and not sharing them with anyone.

7.3 The transmission of information via the internet is not completely secure; any transmission is at your own risk. Although no one can guarantee the security of data transmitted via the internet, we do our best to protect the data transmitted via the NPayout Account. We use industry standard security techniques to help keep the data safe including encryption when the data is in transit and at rest.

7.4 The NPayout website, mobile app, or other channel 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 User Data to these third parties.

8. Data Retention and Deletion

8.1 We retain your personal information for the duration of your engagement with us and for a period following termination of such engagement, as required in order to meet our legal obligations as a payment service provider under applicable laws or regulations and, to the extent not prohibited under applicable law, such additional period in accordance with our internal policies and procedures for purposes of prevention of fraudulent activities, risk management, defense against claims and security

8.2 When you wish to delete your information, you can choose to remove specific NPayout products, including any personal information linked to those products; or you can opt to delete your entire NPayout account. Upon receiving your request to delete data, we will initiate the deletion process to ensure that your data is securely and completely erased from our servers, or kept only in an anonymized form. We strive to ensure that the NPayout service safeguards information against accidental or malicious deletion. However, if

you request deletion, it may require some time to remove all copies from our active and backup systems.

8.3 You should be known that in certain situations, we may not be able to fulfill your request. For instance, if you ask to delete your transaction data but NPayout is legally required to maintain transaction records to comply with relevant laws, we may not be able to delete this information. Additionally, we may deny your request if it interferes with our legitimate use of data for anti-fraud and security purposes, such as when you request to delete an account that is currently under investigation for security reasons.

9. Cookies

To make this site work properly, NPayout, similar to many other major websites, sometimes use small data files called cookies or other tracking technology to track information about your use of our website and services. We may use third party service providers to collect this information on our behalf.

9.1 What are cookies Cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

9.2 How we use cookies and tracking NPayout's website uses the following cookies/tracking mechanisms.

- a. Session cookies. Session cookies are temporary cookies that remain in the cookie file of your browser until you leave the site. We use session cookies to allow you to carry information across pages of our site and avoid having to re-submit the same information. The cookies will be deleted after your web browser has been closed.
- b. Persistent cookies. Persistent cookies remain in the cookie file of your browser for much longer (though how long will depend on the lifetime of the specific cookie). We use persistent cookies:
 - To help us recognize you as a unique visitor when you return to our website and to monitor your use of our website;
 - To allow us to link you to any of our Partners or Affiliates should you come to our website through a paid advert or banner on a website of an Affiliate or Partner.

The cookies will be deleted based on their own expiration period after your web browser has been closed.

- c. Web Beacons. Some of our web pages may contain web beacons which allow us to count users who have visited these pages. Web beacons collect only limited information including a cookie number, time and date of a page view, and a description of the page on which the web beacon resides. These beacons do not carry any personally identifiable

information and are used to track the effectiveness of a particular marketing campaign.

9.3 How to control cookies You can control and/or delete cookies as you wish – for details, see aboutcookies.org. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work.

10. Additional terms for EU Customers

The terms below apply to EU customers in addition to the terms in the rest of the Privacy Policy.

10.1 How to control cookies

You have the right to request details of the information we hold about you, a description of that data, the purposes for which it is being used and any parties with which we share your information. We may charge you an administration fee for providing this information. Your request should be made in writing to the EU Data Protection Officer at support@npayout.com for further information.

10.2 Retention of data

When acting as data processor we will retain data for as long as we are directed by you or for as long as we are required under Applicable Law, but usually for no more than 5 years after the end of the business relationship. If you would like us to delete your Personal Data, please contact us at support@npayout.com and we will respond in a reasonable time. Please note that some or all data may be required in order for the NPayout Services to function properly.

11. Privacy Policy Changes

This Privacy Policy may be revised over time as new features are added to the NPayout services or as we incorporate suggestions from our stakeholders. We may change this Privacy Policy at any time by posting a revised version of it on our website. We will provide you with at least 30 days' prior notice of the effective date of the revised Privacy Policy when it is legally required. We may post the notice on the front page of our website(s) and/or send the notice by e-mail. As of the effective date of the revised Privacy Policy, you will be considered as having consented to all changes to the Privacy Policy. If you disagree with the terms of this Privacy Policy, you may close your account at any time.

12. Liability

WE ARE NOT LIABLE TO YOU IN RESPECT OF ANY CLAIMS, LOSSES, DAMAGES, EXPENSES (INCLUDING REASONABLE LEGAL FEES) ARISING OUT OF OR IN CONNECTION WITH THE USE AND/OR DISCLOSURE OR DISSEMINATION OF THE USER DATA IN

ACCORDANCE WITH THIS PRIVACY POLICY AND ANY CONSENTS THAT YOU MAY HAVE OTHERWISE PROVIDED TO US.