

Jarvix Asia Privacy Policy

Last Updated: 9 September, 2024

1. Introduction

As part of our mission to help make commerce and financial services accessible, friendly and efficient for everyone, Jarvix Asia Limited, its group companies and its affiliates (collectively, “JarvixMoneyMoney”) collect and process a lot of information. This Privacy Policy is intended to help you better understand how we collect, use and store your personal information —whether you are a merchant or end user that uses JarvixMoneyMoney’s products, applications or services (together, the “Services”), a customer that shops at a store using our technology, a customer that has opted into JARVIXMONEY’s applications, a participant in JARVIXMONEY’s “Partners” program, or whether you’re simply visiting this website. By using any of JARVIXMONEY’s Services, or by dealing with a merchant using JARVIXMONEY’s Services, you are agreeing to the terms of this Privacy Policy and, as applicable, the JARVIXMONEY Terms of Service. We may update this Privacy Policy from time to time in order to reflect, for example, changes to our privacy practices or for other operational, legal, or regulatory reasons. If we make material changes to this Privacy Policy, we will give you notice of such changes by posting the revised policy on this website, and where appropriate, by other means. By continuing to use this website or the Support Service after these changes are posted, you agree to the revised policy.

2. Information from merchants

If you are a merchant, your customers need to understand how you (and how JARVIXMONEY) collects and processes their personal information as the data controller. Accordingly, if you use the Services, you agree to post an up-to-date and accurate privacy policy on your storefront that complies with the laws applicable to your business. You also agree to obtain consent from your customers for the use and access of their personal information by JARVIXMONEY and other third parties. In addition, if you are collecting any sensitive personal information from your customers (including information relating to medical or health conditions, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership or sexuality), you

agree to obtain affirmative, express consent from your customers for the use and access of sensitive personal information by JARVIXMONEY and other third parties.

What information do we collect from merchants and why?

- We collect your name, company name, address, email address, phone number(s) and payment details (for example, your credit card information).
 - We use this information to provide you with our Services; for example, to confirm your identity, contact you, provide you with advertising and marketing, and invoice you. We also use this information to make sure that we comply with legal requirements.
- We collect data about the JARVIXMONEY websites that you visit. We also collect data about how and when you access your account and the JARVIXMONEY platform, including information about the device and browser you use, your network connection, your IP address, and information about how you browse through the JARVIXMONEY interface.
- We use this information to give you access to and improve our Services ; for example, to make our platform interface easier to use . We also use this information to personalize the Services for you; for example, by shifting the order of apps in the JARVIXMONEY app store to show you apps we believe may be of interest to you. Finally, we may use this information to provide you with advertising or marketing.
- Upon completing the sign-up process for the Services, and depending on your location, we may create a JARVIXMONEY account on your behalf. If you activate a JARVIXMONEY account (applicable to merchants in certain jurisdictions), we collect your business address, business type, business registration number, date of birth (if you are an individual business owner), bank account information and government-issued identification information where applicable.
 - We use this information to create a JARVIXMONEY account for you, to provide you with JARVIXMONEY services, including fraud and risk monitoring, and to comply with applicable legal and regulatory requirements.
- We collect personal information about your customers that you share with us or that customers provide while shopping or during checkout.
 - We use this information to provide you with our Services and so that you can process orders and better serve your customers.
- Where we need to verify your identity (for example, if there are concerns around identity theft, or if you call into support and we need to authenticate your

account), we may request that you provide us with government-issued identification information.

- We use some of the personal information you provide us to conduct some level of automated decision-making –for example, we use certain personal information to help us screen accounts for risk or fraud concerns.
- We will also use personal information in other cases where you have given us your express permission.

When do we collect this information?

- We collect personal information when you sign up for our Services, when you access our Services or otherwise provide us with the information.
- We also partner with third parties who provide us information about merchants or prospective merchants, for example to help us screen out merchants associated with fraud.

When and why do we share this information with third parties?

- JARVIXMONEY works with a variety of third parties and service providers to help provide you with our Services and we may share personal information with them to support these efforts.
- We may also share your information in the following circumstances:
 - to prevent, investigate, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service or any other agreement related to the Services, or as otherwise required by law.
 - to help us conduct marketing and/or advertising campaigns.
 - to conform to legal requirements, or to respond to lawful court orders, subpoenas, warrants, or other requests by public authorities (including to meet national security or law enforcement requirements).
- Personal information may also be shared with a company that acquires our business, whether through merger, acquisition, bankruptcy, dissolution, reorganization, or other similar transaction or proceeding. If this happens, we will post a notice on our home page.
- JARVIXMONEY will always ask for your consent before sharing your personal information with third parties for purposes other than those described in this Section 2.
- JARVIXMONEY is responsible for all onward transfers of personal information to third parties in accordance with the EU-U.S. Privacy Shield Framework, the Swiss-

U.S. Privacy Shield Framework, and Canada 's Personal Information Protection and Electronic Documents Act (PIPEDA).

3. Information from customers

What information do we collect from our merchants 'customers and why?

- We collect our merchants 'customers 'name, email, shipping and billing address, payment details, company name, phone number, IP address, information about orders you initiate, information about the JARVIXMONEY-supported merchant stores that you visit, and information about the device and browser you use.
 - We use this information to provide our merchants with the Services, including supporting and processing orders, risk and fraud screening, authentication, and payments. We also use this information to improve our Services.
 - We store and use this information to pre-fill your checkout information. We additionally use this information to help customize and improve your experience when you visit a merchant store by presenting to you goods and service that are more likely to be of interest to you.
- We use some of the personal information you provide us to conduct some level of automated decision-making –for example, we use certain personal information (for example, IP addresses or payment information) to automatically block certain potentially fraudulent transactions for a short period of time.

When do we collect this information?

- We collect this information when you use or access a store that uses our Services, such as when you visit a merchant 's store, place an order or sign up for an account on a merchant 's store.
- We also collect this information when you sign-up for a JARVIXMONEY account, or use JARVIXMONEY to pre-fill your checkout information.
- Additionally, we partner with third parties who provide us information about our merchants 'customers, for example to help us screen out merchants associated with fraud.

When and why do we share this information with third parties?

- JARVIXMONEY works with a variety of third parties and service providers to help provide our merchants with the Services and we may share personal information with them to support these efforts.
- We may also share your information in the following circumstances:
- to prevent, investigate, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service or any other agreement related to the Services, or as otherwise required by law.
- If the merchant whose store you visit or access directs us to transfer this information (for example, if they enable a third party app that accesses customer personal information).
- to conform to legal requirements, or to respond to lawful court orders, subpoenas, warrants, or other requests by public authorities (including to meet national security or law enforcement requirements).
- Personal information may also be shared with a company that acquires our business or the business of a merchant whose store you visit or access, whether through merger, acquisition, bankruptcy, dissolution, reorganization, or other similar transaction or proceeding.
- JARVIXMONEY is responsible for all onward transfers of personal information to third parties in accordance with the EU-U.S. Privacy Shield Framework, the Swiss-U.S. Privacy Shield Framework, and Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).
- Information from partners

Partners are individuals or businesses that have agreed to the terms of the JARVIXMONEY Partner Program to work with JARVIXMONEY to promote the Services by (a) referring clients to JARVIXMONEY; (b) developing apps using the JARVIXMONEY Application Interface (API) for merchant use.

What information do we collect from partners and why?

- We collect your name, company name, website, Facebook account, WeChat account or other social media handles, phone number(s), address, business type, email address, Bank Account, and business registration number.
 - We use this information to work with you, confirm your identity, contact you, pay you and to screen for risk, fraud, or other similar types of issues.
- We collect data about the JARVIXMONEY websites that you visit. We also collect data about how and when you access your account and the JARVIXMONEY

platform, including information about the device and browser you use, your network connection, your IP address, and information about how you browse through the JARVIXMONEY interface.

- We use this information to give you access to and improve our Services; for example, to make our platform interface easier to use. We also use this information to personalize the Services for you; for example, by shifting the order of apps in the JARVIXMONEY app store to show you apps we believe may be of interest to you.
- We collect personal information about your customers that you share with us or that they provide to us directly.
 - We use this information to work with you and to provide our Services to your customers.
- We will also use personal information in other cases where you have given us express permission.

When do we collect this information?

- We collect this information when you sign up for a partner account, when you sign up one of your customers for our Services, or when your customers sign up themselves. We also collect any additional information that you might provide to us.

When and why do we share this information with third parties?

- JARVIXMONEY works with a variety of third parties and service providers to help provide you with our Services and we may share personal information with them to support these efforts.
- We may also share your information in the following circumstances:
 - to prevent, investigate, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service or any other agreement related to the Services, or as otherwise required by law.
 - to help us conduct marketing and/or advertising campaigns.
 - to conform to legal requirements, or to respond to lawful court orders, subpoenas, warrants, or other requests by public authorities (including to meet national security or law enforcement requirements).
- Personal information may also be shared with a company that acquires our business, whether through merger, acquisition, bankruptcy, dissolution,

reorganization, or other similar transaction or proceeding. If this happens, we will post a notice on our home page.

- JARVIXMONEY will always ask for your consent before sharing your personal information with third parties for purposes other than those described in this Section 4.
- JARVIXMONEY is responsible for all onward transfers of personal information to third parties in accordance with the EU-U.S. Privacy Shield Framework, the Swiss-U.S. Privacy Shield Framework, and Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).

5. Information from JARVIXMONEY website visitors and support users

What information do we collect and why?

- As you visit or browse the JARVIXMONEY websites, we collect information about the device and browser you use, your network connection, your IP address, and information about the cookies installed on your device. We also collect personal information submitted by you via any online application form ("Online Application") feature and messaging feature available from any of our websites ("Messaging Feature").
- We may also receive personal information when you purchase products, services, prepaid vouchers / credit or make other requests to JARVIXMONEY via any of our websites.
- From telephone support users, we collect your phone number, call audio, and other personal information you provide us during our call. Pursuant to our Terms of Service, we may request additional documentation from you during our call to verify your identity.
- From chat support users, we collect your name, email address, information about the device and browser you use, your network connection, your IP address, chat transcript, and other personal information you provide us during our chat. Pursuant to our Terms of Service, we may request additional documentation from you during our chat to verify your identity.
- From forum users, we collect your name, email address, website URL, and other personal information you may post.

We use this information to verify your account, to provide and enhance our Services (including supporting or servicing your account, if applicable), and answer any questions you may have.

When do we collect this information?

- We collect this information when you visit the JARVIXMONEY websites, use Services offered on our websites or engage with us either by email, web form, instant message, phone, or post content on or through our websites (including forums, blogs , Online Application and via any Messaging Feature). We also collect any additional information that you might provide to us.

6. Information from cookies and similar tracking technologies

What is a cookie? A cookie is a small amount of data, which may include a unique identifier. Cookies are sent to your browser from a website and stored on your device. We assign a different cookie to each device that accesses our website.

Why does JARVIXMONEY use cookies and similar tracking technology?

- We use cookies to recognize your device and provide you with a personalized experience on our websites, or otherwise through the Services. We also use cookies as part of the Services, for example to operate the shopping cart for our merchants 'stores .
- We also use cookies to serve targeted ads from [Google](#) , [Facebook](#) and other third-party vendors.
- Our third-party advertising partners use cookies to track your prior visits to our websites and elsewhere on the Internet in order to serve you targeted ads. For more information about targeted or behavioral advertising, please visit <https://www.networkadvertising.org/understanding-online-advertising> .
- Opting out: You can opt out of targeted ads served via specific third party vendors by visiting the Digital Advertising Alliance 's [Opt-Out page](#) .
- We may also use web beacons, software development kits, and other automated tracking methods on our websites, in communications with you, and in our products and services, to measure performance and engagement.
- Please note that because there is no consistent industry understanding of how to respond to "Do Not Track "signals, we do not alter our data collection and usage practices when we detect such a signal from your browser.

7. Third party apps

- JARVIXMONEY 's platform may allow merchants to connect their account with third party applications to alter or provide new functionalities for their account. Unless listed as "Made by JARVIXMONEY,"JARVIXMONEY is not responsible for and has no control over how these apps function. Merchants ultimately can control which apps they choose to use with their stores, and are responsible for making sure that they do so in compliance with relevant privacy and data protection requirements.

8. For how long do we retain your personal information?

- In general, we keep your personal information throughout your relationship with us. For merchants, this means we will keep your information as long as you maintain an account on our platform. For partners, this means we will keep your information until you inform us that you wish to terminate your partner relationship with us. For our merchants 'customers, we generally process your information solely as a data processor on behalf of our merchants, and it is up to the merchant to determine how long they will store your information in our systems.
- JARVIXMONEY acts as a data processor on behalf of our merchants, except where personal data of merchants 'customers is used for the purposes specified for us in Section 3 'What do we use this data for?'Purposes include for risk and fraud screening.
- Once you terminate your relationship with us, we generally will continue to store archived copies of your personal information for legitimate business purposes such as to defend a contractual claim or for audit purposes and to comply with the law, except when we receive a valid erasure request, or, if you are a merchant, you terminate your account and your personal information is purged pursuant to our standard purge process.
- We will continue to store anonymous or anonymized information, such as website visits, without identifiers, in order to improve our Services.

9. What we don 't do with your personal information

- We do not and will never share, disclose, sell, rent, or otherwise provide personal information to other companies (other than to specific JARVIXMONEY merchants you are interacting with, or to third party apps or service providers

being used by the merchants you are interacting with) for the marketing of their own products or services.

- If you are a merchant using JARVIXMONEY 's Services, we do not use the personal information we collect from you or your customers to independently contact or market to your customers. However, JARVIXMONEY may contact or market to your customers if we obtain their information from another source, such as from the customers themselves.

10. How do we keep your personal information secure?

- We follow industry standards on information security management to safeguard sensitive information, such as financial information, intellectual property, employee details and any other personal information entrusted to us. Our information security systems apply to people, processes and information technology systems on a risk management basis.
- We perform annual audits to ensure our handling of your credit card information aligns with industry guidelines. We partner with PCI DSS Level 1 compliant service providers, which is the highest level of compliance available, and our platform is audited annually.
- No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee the absolute security of your personal information.

11. Residents of the European Economic Area (“EEA ”)

JARVIXMONEY works with merchants and users around the world, including in the EEA. As part of our service, we may transfer your personal information to other regions, including to Canada, United States, Hong Kong, Singapore and Japan. In order to ensure that your information is protected when transferred out of the EEA, JARVIXMONEY relies on the EU-U.S. Privacy Shield (described in more detail below), as well as inter-company agreements between our various affiliates that may process your information on behalf of JARVIXMONEY.

If you are located in the EEA, you have certain rights under European law with respect to your personal data, including the right to request access to, correct, amend, delete, port to another service provider, or object to certain uses of your personal data. If you are a merchant, a partner, a visitor of JARVIXMONEY 's websites, or a user of JARVIXMONEY 's support services and wish to exercise these rights, please reach out to us using the contact information below. If you are a customer of a merchant who uses JARVIXMONEY 's platform and wish to exercise these rights, please contact the

merchants you interacted with directly –we serve as a processor on their behalf, and can only forward your request to them to allow them to respond.

If you are unhappy with the response that you receive from us, we hope that you would contact us to resolve the issue, but you also have the right to lodge a complaint with the relevant data protection authority in your jurisdiction at any time.

Additionally, if you are in the EEA, we note that we are generally processing your information in order to fulfill contracts we might have with you, or otherwise to pursue our legitimate business interests listed above, unless we are required by law to obtain your consent for a particular processing operation. In particular we process your personal data to pursue the following legitimate interests, either for ourselves, our merchants, our partners, or other third parties (including our merchants 'customers):

- To provide merchants and others with our services and applications;
- To prevent risk and fraud on our platform;
- To provide communications, marketing, and advertising;
- To provide reporting and analytics;
- To help merchants find and integrate with apps through our app store;
- To provide troubleshooting, support services, or to answer questions;
- To test out features or additional services; and
- To improve our services, applications, and websites.

When we process personal information to pursue these legitimate interests, we do so where we believe the nature of the processing, the information being processed, and the technical and organisational measures employed to protect that information can help mitigate the risks to the data subject.

13. Automated Decision-Making

In the course of offering our services, JARVIXMONEY uses a number of machine learning algorithms and forms of automated decision-making. For example, we use automated decision-making: to prevent risk and fraud by merchants; to help merchants avoid fraudulent transactions from their customers; to help merchants to perform better marketing and promotion; to personalize merchants 'experience when they use our software platform; and to determine eligibility for certain services (like JARVIXMONEY Credit and JARVIXMONEY Capital).

Most of these algorithms are not fully automated and include some human intervention (for example, customer risk and fraud scores are provided to merchants, who must intentionally decide how to act on them).

14. Control over and access to your personal information

JARVIXMONEY understands that you have rights over your personal information, and takes reasonable steps to allow you to access, correct, amend, delete, port, or limit the use of your personal information. If you are a merchant or a partner, you can update many types of personal information, such as payment or contact information, by contacting our partner support team. If you are unable to change your personal information, or if you are concerned about data collected as you visit JARVIXMONEY 's websites or use our support services, please contact us to make the required changes. If you are a merchant 's customer and wish to exercise these rights, please contact the merchants you interacted with directly –we serve as a processor on their behalf and can only forward your request to them to allow them to respond. It's important to remember that if you delete or limit the use of your personal information, the Services may not function properly.

If you have any questions about your personal information or this policy, or if you would like to make a complaint about how JARVIXMONEY processes your personal data, please contact JARVIXMONEY by email at cs@jarvixasia.com , or by using the contact details below.

15. How to contact JARVIXMONEY

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