convera

Global Privacy Notice

CONVERA GLOBAL PRIVACY STATEMENT

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Updated 1 January 2022

Convera and its subsidiaries and affiliates ("Convera" or "we" or "us") care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data protection laws to better serve you. For a list of local Convera entities, please see the "CONVERA LEGAL ENTITIES" section.

SCOPE OF THIS PRIVACY STATEMENT

This Privacy Statement describes how Convera collects, uses, stores, protects, discloses and shares your personal information or data when you use our Services online through our website, over the phone and through our mobile apps, as well as your choices about the way your information is collected and used. Personal information means all information or data relating to an identified oridentifiable individual.

PERSONAL INFORMATION CONVERA COLLECTS

When you use our services, contact us, access our websites or applications (collectively, the "Services"), we collect personal information about you and may use it along with other information collected or generated during our relationship with you. We collect different types of personal information relating to you, which may include:

- Contact information, for example your name, postal address, email address, telephone number, and date of birth;
- Payment transaction information:
- Business related information that helps us provide our Services to you, how you use our Services, bank and credit information, employer information and permissions to contact or marketing choices;
- Technical information, including the host from which you access the Internet, your IP address or device advertising ID, geolocation if enabled, information about your device (such as device properties, settings, applications, biometric data (e.g., Touch ID/Fingerprint to verify your identity), storage and usage information), mobile application, browser and operating system software, social profile and network information, the date and time you access our websites and the address of the site from which you linked to our website when you visit us. We collect personal information on your online activities as described in the section titled "INTERNET TECHNOLOGIES."
- Compliance information, including fraud prevention, identity verification, and sanction checks.

To provide foreign exchange and payment instructions, or use other foreign exchange or payment services, you must provide certain information required by Convera to execute the transaction and to enable us to comply with our legal obligations associated with our foreign exchange and money transfer services. Failure to provide some of your personal information may affect our ability to provide our Services to you. This may include information about the form of identification used to send or receive a transaction (where required by law) including the identification or a copy of the identification document, transaction activity, bank account and payment information.

HOW CONVERA COLLECTS PERSONAL INFORMATION

Convera collects your personal information in several ways:

- Through transaction forms and your interactions with Convera affiliates and partners;
- Through online forms, registrations or competitions, and other online Services we offer (some of which may be managed by third parties on behalf of Convera);
- While providing customer support or consultation, including using email, postal mail, call centres or live chat;
- Through the process of maintaining and upgrading our Services;
- Through automated means such as communications protocols, email communications and cookies or similar INTERNET TECHNOLOGIES;
- Through any mobile applications (some of which may be managed by third parties on behalf ofConvera);
- Through your use of social media or other public data sources; and
- Through your interest in Convera advertisements placed on third party sites.

In addition to the personal information we collect from you, we may also collect your personal information from your bank as well as our vendors, business partners, identity verification companies, payments and fraud risk management companies, law enforcement bodies, and commercial and public data sources.

HOW CONVERA SECURES YOUR PERSONAL INFORMATION

We endeavour to use organisational, technical and administrative safeguards that comply with applicable government laws and regulations to secure your personal information. We also endeavour to restrict information access to our employees, partners and representatives that need to know it. Despite our efforts, and as you probably know, third parties may unlawfully intercept or access transmissions sent to us or may wrongly instruct you to disclose personal information to them while posing as Convera.

Please contact us immediately in accordance with the "CONTACTING US" section, if you have reasonto believe your personal information held by Convera may be at risk.

INTERNET TECHNOLOGIES

We use internet technologies like cookies, tags and web beacons on our websites, in mobile applicationsor when you visit a third-party website for which Convera provides online Services for a variety of purposes, including, but not limited to those identified in the section titled "HOW CONVERA USES THE PERSONAL INFORMATION IT COLLECTS".

Convera has implemented the capability for the user to manage cookies on our websites. We will only read or write cookies based on your preference level. For more information on how Convera uses cookies please refer to our website.

HOW CONVERA USES THE PERSONAL INFORMATION IT COLLECTS

Convera utilises the personal information it collects for the following commercial purposes:

- Performing the Services: To assist us in providing Services to you and help you to receive
 a personalised experience and assist you in carrying out transactions and accessing account
 information;
- **Authentication:** To recognise you and allow you to remain signed-in during your visit withouthaving to re-enter your password;
- Analytics: To perform analytics on understanding our customers, improving their experience;
- **Web Traffic Analysis:** To determine whether you came to Convera from a banner ad or an Affiliate:
- Advertising: To deliver information specific to your interests on non-Convera websites and applications;
- **Analysis of Promotions:** To better understand the effectiveness of our promotional campaigns and whether you acted on our promotional messages; and
- **Fraud Prevention:** To promote safety, reduce financial risk and combat fraud across our Services.

LEGAL BASES UPON WHICH WE USE YOUR PERSONAL INFORMATION

Convera may use your personal information as explained elsewhere in this Privacy Statement for each of the following legal bases:

- <u>We use your personal information to provide our Services to you</u>. This includes using personal information necessary for processing foreign exchange and payment transactions or otherwise conducting foreign exchange and payment services offered to you. We may use this information in the performance of a contract with you or for taking steps to enterinto a contract for any of the above or for any other Convera products or services.
- We use your personal information for legitimate business purposes. This includes using personal information to analyse and improve our products, locations, services, operations, the running of this site and your customer experience, and for measuring marketing return on investment and brand satisfaction. This may include using your information to conduct market research surveys. We may also use your personal information to provide customer services and to help protect the security and integrity of our technology, systems, and services.
- We use your personal information for legal and compliance purposes: This includes using personal information needed to comply with legal and regulatory duties related to anti-money laundering and counter-terrorist financing; detection, prevention and prosecution of fraud and theft as well as preventing illegitimate or prohibited use of our Services or other illegal or wrongful activity. This may also include establishing, exercising, or defending legal rights and claims of Convera and others, and monitoring and reporting compliance issues. This may further include using your personal information to validate and authenticate your identity and utilising third parties to help us do so.
- We may process your personal information based on your consent as outlined in this Privacy
 <u>Statement</u>: This includes consent for receiving marketing communications, or where otherwise
 required by applicable law. If we request your consent, we will inform you of the intended
 purposes for which your information will be processed.

We will inform you when additional information is required to provide the Services you request or is required by law.

HOW CONVERA MARKETS TO ITS CUSTOMERS

Convera will also, subject to your preferences, notify you of offers, promotions and updates regarding our products and Services. These may include offers by email, telephone, postal mail, social media and other communication or digital channels.

You can opt out of receiving marketing communications at any time. If you no longer want to receive marketing-related communications from us on a going-forward basis, you may opt out by following theinstructions in the relevant electronic communication or by contacting us as described in the "CONTACTING US" section.

Please note that if you opt out of receiving marketing-related communications from us, we may still send you important service, administrative or transaction-related communications.

INFORMATION FROM CHILDREN

Convera does not provide our Services or products to children under the age of 18. Convera does not knowingly collect or maintain information from persons under the age of 18 other than for purposes oflegal or compliance.

EXTERNAL WEBSITES

Convera 's Website may be linked to or from third party websites. Convera has not reviewed, does not control, and is not responsible for the content or privacy practices employed by websites that are linked to or from our website. Convera does not assume responsibility for any of these sites, their content, or their privacy policies. Convera does not endorse third party websites or make any warranties about any information, software or other products or materials you may find there, or any results that may be obtained from using them.

For further information about liability towards external websites, please review our Terms of Use.

WHO CONVERA SHARES YOUR DATA WITH

For any of the purposes listed in this Privacy Statement, Convera may disclose applicable personal information including, but not limited to, your name, contact information, national identification number, customer ID number, address, transaction patterns and bank account information to the following types of organisations or parties:

- Convera group companies and affiliates, including those listed in the section titled "CONVERA LEGAL ENTITIES":
- Entities owned by The Western Union Company which are required to support Convera for the processing of payment transactions and storing Personal Data;
- Local licensed entities who are supporting, partnered with or receiving services from Convera;
- Our business partners who facilitate our payment transactions or specific Services you have requested;
- Vendors, payments processors, banking partners and data processors contracted to provide business and customer services;
- Customer services, based on your consent where applicable, including marketing, advertising and customer satisfaction and market research on our behalf;

- Vendors and data processors contracted to help us validate the accuracy of the information provided by you, and to authenticate your identity and manage risks related to security, fraud and identity.
- Third parties that you have authorised to access your account and/or your account information
 in order to perform Services for you, such as account information service providers and
 payment initiation service providers.

We may transmit personal information we possess in connection with a sale or transfer of all or part of our business. We may also disclose your personal information globally, as required or permitted by applicable laws and regulations, to regulatory and financial authorities, credit reporting agencies, law enforcement bodies, courts, governments or government agencies, to meet compliance and legal obligations or to assert or defend the rights and interests of Convera or others.

INTERNATIONAL DATA TRANSFERS

We transfer your information to parties in countries outside the country it was collected, including but not limited to the USA, as permitted or required by applicable law, regulatory authorities, law enforcement and government agencies. Additionally, when you send or receive money to or from another country, we will also be required to share some of your personal information with that country as required or permitted by law

We transfer certain personal information about you to our data centres located in the USA or within a region as required by local law and process it to fulfil our legal and compliance obligations which apply toour Services. We also store certain personal information we collect based on your marketing choices in our US data centre. By using Convera 's Services, you acknowledge that such transfers of information outside of your country of residence may occur.

TRANSFERS FROM THE EEA

Personal information transferred outside the EEA to countries that the European Commission has not found to provide adequate protection will be protected by appropriate contractual clauses or other EU- approved mechanisms, as required by law. You may obtain a copy of these measures by following thislink: http://ec.europa.eu/justice/dataprotection/international-transfers/transfer/index en.html.

RETENTION OF PERSONAL INFORMATION

Your personal information will be retained in accordance with statutory periods contained in regulations applicable to financial transactions including those in anti-money laundering, anti-terrorist financing and other laws applicable to us. Otherwise, we will retain your information if necessary for the specific purposes it was collected, or to resolve any query you may raise. We will typically keep your information

for no longer than the purpose(s) for which it was obtained, unless we have a legal or regulatory obligation to keep it for a longer period or retention is advisable for Convera 's legal position (for example, regarding applicable statutes of limitations, litigation or regulatory investigations).

ACCESSING, DELETING AND CORRECTING YOUR PERSONAL INFORMATION

You have the right to know if we are processing your personal information and to ask us for a copy of your information free of charge. You have the right to request a structured and machine-readable copy of certain information you have provided to us. We may charge you a reasonable fee for providing the information, or not act upon your request, if the request is manifestly unfounded or excessive. You have the right to stop us from sending you marketing communications. You have the right to ask us to correct information about you that is incomplete, inaccurate or out-of-date. You have the right to ask us to delete certain information about you, to restrict certain uses of information relating to you, and to object to certain uses of it. To the extent we are processing personal information based on your consent, you may withdraw your consent as permitted by applicable law.

You also have the right to lodge a complaint with a relevant data protection regulator or supervisory authority about our processing of personal information. When we receive a request, we may ask for additional information from you to verify your identity. In some situations, we may refuse to act or may impose limitations on your rights, as permitted by applicable law. To exercise these rights, please visit our website or contact Convera through the section titled "CONTACTING US".

We endeavour to respond to your request within 30 days but response time may vary depending on the laws and regulations applicable to your request and we may be entitled to extend this period in certain circumstances. We will comply with your request to the extent required by applicable law.

CONTACTING US

If you have a question or complaint about how we handle your personal information, we ask that you put your enquiry in writing. We will investigate your enquiry and generally respond to you in writing within 30days of receipt. You can also contact us at privacymatters@convera.com.

To contact us via a toll-free or local phone number, please refer to the contact section of our website.

CHANGES

Convera reserves the right to modify this Privacy Statement. Updated privacy statements will be posted on our website when amendments occur. We urge you to review this Privacy Statement when you visit to obtain the most current statement.

US PRIVACY NOTICE

CALIFORNIA ADDENDUM TO THE CONVERA GLOBAL PRIVACY STATEMENT

We care about the privacy of our Californian users and are committed to collecting, using, storing, protecting, disclosing and sharing your personal information in accordance with the California Consumer Privacy Act of 2018 ("CCPA"). This California Addendum to the Convera Privacy Statement ("**Addendum**") is applicable to residents of California and, in conjunction with the Privacy Statement, is intended to address the requirements of the CCPA.

When you use our Services, we collect personal information about you as permitted by applicable laws and regulations (including but not limited to the Graham Leach Bliley Act). The Categories of Personal Information described below are subject to the CCPA.

For more information about the personal information that may have been collected about you, please review our Privacy Statement.

COLLECTION OF PERSONAL INFORMATION

In the 12 months prior to the effective date of the Privacy Statement, Convera may have collected the below Categories of Personal Information from the indicated Categories of Sources; this information may have been shared with the described Categories of Third Parties for the specified Business Purposes. Categories of Sources, Categories of Third Parties, Commercial Purposes and Business Purposes are further defined in the Privacy Statement and below.

| Categories of Personal Information | Categories of Sources | Business and Commercial Purposes | Categories of Third Parties |
|--|--|--|---|
| Identifiers: contact informationprovided for example your name, postal address, email address and telephone number; date of birth provided; social profile and network information; IP address; deviceidentifier; mobile ad identifier; cookies; beacons; and pixel tags. | You Our Website Affiliates, Subsidiaries or Vendors Mobile Applications | Auditing Security Purposes Performing theServices Quality Purposes Authentication Analytics Web Traffic Analysis Advertising Analysis of Promotions Safety | Government entities Professional services organisations Advertising and social networks Data analytics providers Our affiliates and subsidiaries |
| Internet and Other Electronic Network Activity Information: including the host from which you access the Internet, information about your device (such as device properties, settings, applications, storage and usage information), mobile application, browser and operating system software, the date and time you access our websites and the address of the site from which you linked to ourwebsite when you visit us. | Your Use of Our Website Affiliates, Subsidiaries or Vendors Your Use of Mobile Applications Social Media Networks or Publicly Available Sources Advertisin gNetworks | Auditing Security Purposes Debugging Short Term Use Performing theServices Internal R&D Quality Purposes Authentication Analytics Web Traffic Analysis Advertising Analysis of Promotions Safety | Government entities Professional services organisations Advertising and social networks Internet service providers Data analytics providers Operating systems and platforms Our affiliates and subsidiaries |
| Geolocation Data: may be collected from your devices only if enabled | Your Use of Mobile Applications | Auditing Security Purposes Short-term use Internal R&D Quality Purposes Safety | Advertising andsocial networks Data analytics providers Operating systems and platforms |

Categories of Sources: in the 12 months prior to the effective date of the Privacy Statement, Converamay have collected Personal Information about you from the following Categories of Sources:

- **You:** we may collect information directly from you, for example, through transaction forms and your interactions with Convera partners or through providing customer support or consultation, including using email, postal mail, call centres or live chat;
- Your Use of Our Website: we may collect information from you or your device through your use of our Website, including online forms, registrations for loyalty and rewards programmes or competitions, and other online Services we offer (some of which may be managed by third parties on behalf of Convera) or through automated means such as communications protocols, email communications and cookies or similar technologies as described in the Privacy Statement section titled "INTERNET TECHNOLOGIES";
- **Affiliates, Subsidiaries or Vendors:** we may collect information about you from our affiliates, subsidiaries or vendors who provide services on our behalf;
- Your Use of Mobile Applications: we may collect information from you or your device through your use of mobile applications (some of which may be managed by third parties on behalf of Convera):
- **Social Media Networks or Publicly Available Sources:** we may collect information about you from social media or other public data sources; and
- **Advertising Networks:** we may collect information about you from advertising networks so we can serve you with advertisements we believe may be of interest to you.

Business Purposes: in the 12 months prior to the effective date of the Privacy Statement, Convera may have shared your Personal Information for the following Business Purposes:

- Auditing: related to our interactions with you and any concurrent transactions, including, but
 not limited to, counting ad impressions, verifying positioning and quality of ad impressions,
 andauditing compliance with applicable standards;
- **Security Purposes:** detecting security incidents, protecting against malicious, deceptive, fraudulent or illegal activity and prosecuting those responsible for that activity;
- **Debugging:** debugging to identify and repair errors that impair the intended functionality of oursystems;
- **Short-term use:** short term, transient use, including, but not limited to, the contextualcustomisation of ads shown as part of your interactions with us;
- Performing the Services: in addition to the purposes described in the Privacy Statement, maintaining or servicing accounts, providing customer service, processing or fulfilling orders and transactions, verifying your information, processing payments, providing financing, providing advertising or marketing services, providing analytic services, or providing similar services;
- **Internal R&D:** undertaking internal research for technological development and demonstration; and
- **Quality Purposes:** undertaking activities to verify or maintain the quality or safety of the Services and to improve, upgrade or enhance the Services.

Categories of Third Parties: in the 12 months prior to the effective date of the Privacy Statement, Convera may have shared your Personal Information with the following Categories of Third Parties:

- Government entities: government entities including law enforcement agencies;
- **Professional services organisations:** professional services organisations, such as law firms and independent auditors;

- Advertising and social networks: advertising and social networks (who may combine your
 personal information with their own records, and records available from other sources for their
 own marketing purposes);
- Internet service providers;
- Data analytics providers;
- Operating systems and platforms; and
- Our affiliates and subsidiaries.

SALE OF PERSONAL INFORMATION

Convera does not sell your personal information to third parties in exchange for money. Convera does participate in advertising, marketing and analytic programmes from which we and third parties with whom we contract may derive value; such exchanges may constitute a "sale" under applicable law. While participating in the above programmes, in the 12 months prior to the effective date of the Privacy Statement, Convera may have "sold" your personal information to a third party including:

- **Identifiers**: contact information, for example your name, email address and telephone number; and
- Internet and Other Electronic Network Activity Information: including the host from which you access the Internet, your IP address or device advertising ID, information about your device (such as device properties, settings, applications, storage and usage information), mobile application, browser and operating system software, social profile and network information, the date and time you access our websites and the address of the site from which you linked to our website when you visit us.

CALIFORNIA RESIDENT RIGHTS

California residents have the right to request that their personal information not be sold to third parties. To exercise your right to opt out of the sale of your personal information, please submit a personal information request as described above in the section of our Privacy Statement entitled "ACCESSING, DELETING AND CORRECTING YOUR PERSONAL INFORMATION AND CHANGING YOUR CHOICES".

In addition, if you are a California resident, you may have the right to request, twice in a 12-month period, the categories of personal information we have collected about you during the past 12 months and, for each category of personal information, the following information:

- the categories of sources from which we collected that information;
- our business or commercial purpose(s) for collecting that information;
- the categories of third parties to whom that information was sold or disclosed for a businesspurpose; and
- the business or commercial purpose(s) for which we sold or disclosed that information.

You also may have the right to request the deletion of the personal information we have collected from you. Once you have confirmed you are a California resident, you may submit a personal information request in accordance with the Privacy Statement section entitled "ACCESSING, DELETING AND

CORRECTING YOUR PERSONAL INFORMATION AND CHANGING YOUR CHOICES" twice in any 12-month period. Upon receiving a request, Convera will confirm receipt of the request within 10 days and will provide information on how we will verify your identity and process your request. We will then respond to the request within 45 days.

Convera cannot connect individual consumers to passive website visits which may affect our ability to respond to certain requests. Convera has implemented the capability for the user to manage cookies on our websites and will only read or write cookies based on your preference level. When you visit our website, you will be presented with a banner instructing you how to manage your preferences.

You may also designate an authorised agent to make a personal information request on your behalf. If you choose to designate an agent, you may be required to provide the authorised agent with written permission to make your request and verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they have been authorised by you to act on your behalf.

You have the right not to be discriminated against because you exercise any right described in the Privacy Statement or this Addendum.

CONTACT

Contact for More Information: for questions or concerns about our Privacy Statement and privacy practices, please contact us as specified in the "Contacting Us" section of the Privacy Statement.

CONVERA DATA CONTROLLERS

| Western Union Legal Name of Entity ¹ (as at 1 January 2022) | Change of Legal Name to reflect Convera | Contact Information / Address |
|--|--|---|
| Custom House Financial (UK) Ltd | Convera UK Ltd | Alphabeta Building, 3rd Floor, 14-18 Finsbury Square, London, EC2A 1AH, United Kingdom |
| N/A | Convera UK Financial Limited | Alphabeta Building, 3rd Floor, 14-18 Finsbury Square, London, EC2A 1AH, United Kingdom |
| Western Union Business Solutions (Australia) Pty Ltd ² | Convera Australia Pty Ltd | Level 12 1 Margaret Street , Sydney NSW, New South Wales, 2000 Australia |
| N/A | Convera Canada ULC | 1500-100 Yonge Street, Toronto, Ontario, M5C2W1, Canada |
| N/A | Convera USA, LLC | 7979 E. Tufts Ave., Denver, CO 80237 |
| Western Union Business Solutions (Hong Kong) Ltd | Convera Hong Kong Ltd | Unit 2210-18, Tower 1, Millennium City 1, 388 Kwun Tong Road, Kwun Tong, Kowloon, Hong Kong |
| N/A | Convera Japan KK | c/o Kusunoki, Iwasaki & Sawano, Holland Hills Mori Tower 11F5-11-1, Toranomon, Minato-ku, Tokyo 105-0001, Japan |
| Western Union Business Solutions (Malta) Limited | Convera Malta Financial Limited | W Business Centre, Level 5, Triq Dun Karm, Birkirkara, Malta |
| WUBS Financial Services (Singapore) Pte Ltd | Convera Singapore Financial PteLtd | 77 Robinson Road , #35-01 Robinson 77 Singapore, 068896 |
| Western Union Business Solutions (Singapore) Pte Ltd | Convera Singapore Pte Ltd | 77 Robinson Road , #35-01 Robinson 77 Singapore, 068896 |
| N/A | Convera Switzerland, LLC | The Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801 |
| N/A | Convera Europe S.A. | 9, rue de Bitbourg, L - 1273, Luxembourg |
| N/A | Convera Europe Financial S.A. | 9, rue de Bitbourg, L - 1273, Luxembourg |

Convera is not affiliated with The Western Union Company and utilises the Western Union name under a limited license. Western Union named entities are intended to be rebranded "Convera" in due course. Upon completion, updated information will be included in this Privacy Statement.

² Data controller for Services as described in this Statement in Australia, Japan, New Zealand