

**PRIVACY NOTICE**  
**EFFECTIVE DATE: 1<sup>ST</sup> OF JUNE 2019**

areeba SAL (“areeba”) respects your privacy. This Privacy Notice applies to the Simplify Commerce Service (the “Service”) available at [areeba.simplify.com](http://areeba.simplify.com) (the “Site”).

It describes the types of personal data we collect in connection with the Service, the purposes for which we collect such personal data, the other parties with whom we may share it, the measures we take to protect the security of the data and our direct marketing practices. It also tells you about your rights with respect to your personal data, how you can reach us to update your information or get answers to questions you may have about our privacy practices.

This Privacy Notice does not cover the collection and use of your personal data by third parties on the application, on other Bank-branded websites, or any other information or communications that may reference areeba outside Simplify Commerce Services. For more information about areeba’s privacy practices, visit areeba’s Global Privacy Notice at <https://www.areeba.com/english/privacy-policy>

### **1. Marketing Communications**

If you opt-in to receive communications about areeba products or services or Simplify Commerce, we may send you communications that we believe may be useful to you. You can at any time tell us not to send you marketing communications by email by clicking on the unsubscribe link within the marketing e-mails you receive from us or by clicking [www.simplify.com/commerce/unsubscribe](http://www.simplify.com/commerce/unsubscribe). We will apply your preferences going forward.

### **2. Personal Data We Collect**

In connection with the Service, we collect certain personal data from merchants participating in the Service (“Merchants”) and their respective service providers, developers and/or admins when an account is being created on behalf of a Merchant as part of the enrollment process to the Service. Such personal data includes, but is not limited to, business type, legal name, tax id, business start date, filing state, business address, owner name, owner date of birth, owner phone number, owner mobile phone number, owner social security number, owner address, customer service phone number, bank name, bank routing number, bank account number, username, and password.

If you create a developer account in connection with the Service, we collect personal data from you in order to operate your account. Such personal data includes, but is not limited to, First Name, Last Name, Email (doubles as Username), and Password.

We may also process the personal data of individuals who make payments through the Service on behalf of Merchants. There are obligations that apply to Merchants with respect to personal data about individuals making payments to Merchants through the Service, which are described in the Merchant Terms of Use [https://www.areeba.com/Library/Assets/Gallery/PDF/Simplify\\_Merchant\\_Terms\\_of\\_Use.pdf](https://www.areeba.com/Library/Assets/Gallery/PDF/Simplify_Merchant_Terms_of_Use.pdf) (“Merchant TOU”). Please make sure to read the Merchant TOU carefully to make sure you understand how these obligations may apply to you and that you can comply.

### **3. Information We Collect Automatically**

We also may collect certain information by automated means such as cookies and web beacons, for example to remember you. A cookie is a text file containing small amounts of information which is downloaded on your device’s memory and can subsequently be accessed by our web servers. A web beacon is an object embedded in and downloaded together with a webpage which accordingly provides information as to the viewing of that webpage. This paragraph provides you with information about these technologies and their purpose.

#### ***Strictly necessary or essential cookies***

Strictly necessary and/or essential cookies enable you to use the Service and to securely access the Site and its functionalities.

The following information is placed in/collected through these cookies: session ID (to remember your credentials in the course of your session); and server affinity and authentication data (to establish and maintain communication with the most appropriate servers). Session cookies are deleted when you log out of the Site.

You may reject these strictly necessary cookies by altering the cookie function of your browser. The “help” portion of the toolbar on most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. However, if you reject these cookies, you will not be able to use the Service, as these cookies are strictly necessary for the Service to operate.

#### **4. How Do We Use Personal Data We Collect**

We may use the personal data we obtain about you to:

- Create and manage your online account, provide the Service to you, and respond to your inquiries;
- Validate your payment card information;
- Provide, administer and communicate with you about products, services and promotions including the display of customized content and advertising;
- Protect against and prevent fraud, unauthorized transactions, claims and other liabilities, and manage risk exposure and franchise quality;
- Operate, evaluate and improve our business (including by developing new products and services; managing our communications; determining the effectiveness of our advertising; analyzing our products, services and websites; facilitating the functionality of our websites; and performing accounting, auditing, billing, reconciliation and collection activities);
- Assist third parties in the provision of products or services that you request from third parties;
- Monitor the use of and improve our interactive assets, including the Simplify Commerce website;
- Perform data analyses (including anonymization of personal information) in furtherance of the foregoing;
- Enforce our Simplify Commerce Merchant Terms of Use;
- Comply with applicable legal requirements and industry standards and our policies; and
- Perform auditing, research and analysis in order to maintain, protect and improve our service.

#### **5. Your Rights and Choices**

You have certain rights regarding the personal data we maintain about you. We offer you choices about what personal data we collect from you, how we use that data, and how we communicate with you.

You may refrain from submitting information to us. However, if you do not provide personal data when requested, you will not be able to register with the Service and we may not be able to provide you with information about the Simplify Commerce products and services.

You have the right to request access to and receive information about the personal data we maintain about you, update and correct inaccuracies in your personal data, as appropriate. The right to access personal data may be limited in some circumstances by local law requirements. To learn more, please contact us as set forth below.

## **6. Personal Data We Share**

We do not sell or otherwise disclose personal data we collect about you, except as described herein or otherwise disclosed to you at the time the data is collected.

We share personal data to perform the services requested through the Service. When you create an account with areeba, either for yourself or on behalf of a Merchant, we share your personal data with the independent third party acquirer you have chosen in connection with the Service (referred to herein as “**Processor**”), to allow them to review and evaluate your account application, to create an account for you, to process payment transactions performed on such Merchant’s customers and to provide the Service. Since areeba will be responsible for the processing of your personal data for the above mentioned purposes you should become familiar with its privacy and data protection practices as detailed in their privacy notice.

We may also share personal data with our affiliates, entities that assist with payment card fraud prevention, and merchants. We may share aggregated and de-identified information with participating financial institutions and their customers. For example, we may share data to show trends about the general use of the Service.

We also may share data with our service providers who perform services on our behalf. We do not authorize these service providers to use or disclose such data except as necessary to perform certain services on our behalf or comply with legal requirements. We require these service providers by contract to appropriately safeguard the privacy and security of personal data they process on our behalf.

We may work with third parties to provide additional products or services which may be offered to you. At the time these products or services are offered to you, you will be asked if you consent to share your personal data with such third parties for the purpose of providing such product or service, or for other purposes, such as marketing. If you agree with our sharing your personal data with such third party for such specific purpose, we then may share your personal data with such third party.

We also may disclose personal data about you (i) if we are required to do so by law or legal process, (ii) if we are requested by law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We also reserve the right to transfer personal data we hold about you in the event we sell or transfer all or a portion of our business or assets. We may also disclose your personal data to potential acquirers in the event of a prospective sale or transfer. Following such a sale or transfer, you may contact the entity to which we transferred your personal data with any inquiries concerning the processing of that information.

## **7. How We Protect Personal Data**

We restrict access to personal data about you to those employees who need to know that information to provide products or services to you. We maintain appropriate administrative, technical and physical safeguards to protect the personal data we have about you against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing. We also take measures to destroy or permanently de-identify personal information when there is no longer a business need to keep the information. The types of measures we take vary with the type of information, and how it is collected and stored.

## **8. Data Transfers**

We may transfer personal information to countries other than the country in which the data was originally collected. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your personal information to other countries, we will protect that information as described in this Privacy Notice.

Simplify Commerce is provided on a global platform. To offer our services, we may need to transfer your personal information among several countries. We endeavor to comply with applicable legal requirements providing adequate safeguards for the transfer of personal information to countries outside of your local country.

## **9. Features and Links to Other Websites**

The Service may contain links to Internet sites maintained by third parties. Any personal data collected on the resulting site will not be controlled by such third parties or their service providers but will be subject to the privacy notice and terms of use of the resulting site. We strongly suggest that you review the Privacy Notice and terms of use of the resulting site.

## **10. Updates to Our Privacy Notice**

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a prominent notice on our websites to notify you of any significant changes to our Privacy Notice and indicate at the top of the notice when it was most recently updated. Please check this Privacy Notice and the Simplify Commerce website periodically to ensure that you are aware of any changes or updates.

## **11. How to Contact Us**

To update your preferences, ask us to remove your data from our mailing lists or submit an access request for information collected through this Site or the Service, please contact us as specified below. The right to access personal data may be limited in some circumstances by local law requirements.

When submitting a request to exercise your data protection rights, it must be done in writing and contain and/or enclose the following:

- i. The name of the data owner and its domicile and/or other means to communicate to the same our response to the request received;
- ii. The specific indication of the data protection right which you wish to exercise; and
- iii. A clear and precise description of the personal data for which the exercise of any data protection rights is pursued

If you are a Merchant, to exercise your data protection rights in relation to the operation of the Service performed by Processor and the relevant payment transactions, please email Simplify Commerce Customer Support at [insert email address] and we will pass your email on to the Processor.

If you have any questions or comments about this Privacy Notice or if you would like us to update the data we have about you or your preferences, please [click here](#). You may also contact us by writing to:

[support@areeba.com ]:

To assist us in responding to your request, please provide us with information of your issue or concern and include as many details as possible. We will review and respond to all complaints within a reasonable period of time. If you are not satisfied with our response, to the extent permitted by applicable law, you may take your complaint to the applicable regulator in your jurisdiction.

## Cookie Notice

**Effective Date: 1<sup>st</sup> of June 2019**

Areeba SAL (“**areeba**”) respects your privacy. The Simplify Commerce Service (the “**Service**”), available at [areeba.simplify.com](http://areeba.simplify.com) (the “**Site**”), uses cookies, web beacons and similar technologies (collectively, “**cookies**”) to function effectively. A cookie is a text file containing small amounts of information which is downloaded on your device’s memory and can subsequently be accessed by our web servers. A web beacon is an object embedded in and downloaded together with a webpage which provides information as to the viewing of that webpage.

This Cookie Notice provides you with information about the cookies used on the Site, their purpose, and the choices you can make with regard to the use of cookies. You can find more by accessing the Cookie Consent tool on the Site.

### Cookies used on the Site

- *Essential cookies*

Some cookies are essential for the Site to function effectively and to offer you Site services. For example, essential cookies enable you to securely access and navigate within the Site and its functionalities or sign-in.

Essential cookies collect the following information: session ID (to remember your credentials in the course of your session); security token and other server affinity and authentication data (to establish and maintain communication with the most appropriate servers).

We use essential cookies for the duration of each session (“**session cookies**”). Session cookies are deleted when you log out of the Site or when you close your web browser.

Session cookies are also used by us or our service providers to know whether our cookie consent notice has been viewed and to allow for the frequency capping of the cookie on-site notice (an on-site cookie notice at the bottom of the landing page that informs you that cookies are used on the Site and how to enable and disable them). In addition, we use session cookies to remember the choices you make on our Site, for example, to remember your language preferences.

You may reject essential or session cookies by altering the cookie function of your browser. The “help” option of the toolbar on most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. However, if you reject these cookies, you may not be able to use full or part of the Site, as these cookies are strictly necessary for the Site to operate.

- *Advertising cookies*

Third party cookies listed in the Cookie Consent tool are used for web advertising purposes, such as to understand your use of the Site and your online activities and to present you with relevant offers and advertisement tailored to your interests, including on the basis of your selected country or language. You may see certain advertisement on other websites because we work with advertising partners to customize relevant content to you on third-party websites.

Advertising cookies collect the following information: unique identification assigned to your device; IP address; device and browser type; operating system; referring URLs; content viewed, products purchased, or other actions taken on the Site; time and date of those actions; country information.

You may enable or disable advertising cookies from being placed and accessed on your device through the Cookie Consent tool of the Site.

- *Analytics cookies*

Areeba and third party analytics cookies like Omniture cookies are used on the Site for website analytics purposes, such as creating anonymized reports and statistics on the performance of the Site. In addition, third party cookies listed in the Cookie Consent tool used to manage and improve the performance of the Site. This includes performance cookies that help us understand the use of the Service, including on the basis of your selected country or language.

Analytics cookies help collect the following information: unique identification assigned to your device; IP address; device and browser type; operating system; referring URLs; time and date page was visited; information on actions taken in the course of using the Site; country information.

You may enable or disable third party analytics cookies from being placed and accessed on your device through the Cookie Consent tool of the Site