



PRIVACY POLICY

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Welcome to “eNet”!

Automated Services Network Company and its affiliates (collectively “eNet”, “we” and “us”) respect your privacy. We offer services that enable platforms and merchants to run businesses, and to safely conduct online payment transactions.

This Privacy Policy describes the types of Personal Data we collect through our payments products and services (“**Services**”) and via our online presence, which include our main website at “eNet”.com, as well as services and websites that we enable Internet users to access, such as “eNet” Checkout and the “eNet” Shop (collectively, our “**Sites**”).

This policy also describes how we use Personal Data, with whom we share it, your rights, and choices, and how you can contact us about our privacy practices.

This policy does not apply to third-party websites, products, or services, even if they link to our Services or Sites, and you should consider the privacy practices of those third-parties carefully.

1. OVERVIEW

“eNet” obtains Personal Data about you from various sources to provide our Services and to manage our Sites. “You” may be a visitor to one of our websites, a user of one or more of our Services (“User” or “eNet” User”), or a customer of a User (“Customer”). If you are a customer, “eNet” will generally not collect your Personal Data directly from you. Your agreement with the relevant “eNet” User should explain how the “eNet” User shares your Personal Data with “eNet”, and if you have questions about this sharing, then you should direct those questions to the “eNet” User.

Site visitors.

If you visit or use our Sites, we may collect Personal Data. For example, we collect Personal Data that you submit to us via online forms and surveys, and when you contact us by email.

Payment processing services (“eNet” as a data processor).

As a processor of payment transactions and provider of related services, we may collect, use, and disclose Personal Data about Customers when we act as a “eNet” User’s service provider. “eNet” Users are responsible for making sure that the Customer’s privacy rights are respected, including ensuring appropriate disclosures about third party data collection



PRIVACY POLICY

and use. To the extent that we are acting as a “eNet” User’s data processor, we will process Personal Data in accordance with the terms of our agreement with the “eNet” User and the “eNet” User’s lawful instructions. If you are a customer and would like to obtain more information about how a “eNet” User uses third party services like “eNet” to process your Personal Data in the context of payment transactions, please contact the “eNet” User directly or visit the “eNet” User’s privacy policy.

Fraud prevention activities and activities for offering a compliant and secure platform.

The collection and use of Personal Data is critical in helping us to ensure that our platform and services are safe, secure, and compliant. In the context of fraud monitoring, prevention, and detection services, we may monitor insights and patterns of payment transactions and other online signals to reduce the risk of fraud, money laundering and other harmful activity for ourselves, our Users, and their customers. The “eNet” entities responsible for the collection and use of Personal Data for fraud monitoring, detection and prevention activities are indicated below.

2. PERSONAL DATA WE COLLECT

Personal Data that we collect about you.

Personal Data is any information that relates to an identified or identifiable individual. The Personal Data that you provide directly to us through our Sites will be apparent from the context in which you provide the data. In particular:

When you register for a “eNet” account we collect your full name, email address, and account log-in credentials.

When you fill-in our online form to contact our sales team, we collect your full name, work email, country, and anything else you tell us about your project, needs and timeline.

When you use the “Remember Me” feature of “eNet” Checkout, we collect your email address, payment card number, CVC code and expiration date.

When you respond to “eNet” emails or surveys we collect your email address, name, and any other information you choose to include in the body of your email or responses. If you contact us by phone, we will collect the phone number you use to call “eNet”. If you contact us by phone as a “eNet” User, we may collect additional information to verify your identity.

If you are a “eNet” User, you will provide your contact details, such as name, postal address, telephone number, and email address. As part of your business relationship with us, we may also receive financial and personal information about you, such as your date of birth and government identifiers associated with you and your organization (such as your social security number, tax number, or Employer Identification Number).

If you are a customer, when you make payments or conduct transactions through a “eNet” User’s website or application, we will receive your transaction information. Depending on how the “eNet” User implements our Services, we may



PRIVACY POLICY

receive this information directly from you, or from the “eNet” User or third parties. The information that we collect will include payment method information (such as credit or debit card number, or bank account information), purchase amount, date of purchase, and payment method. Different payment methods may require the collection of different categories of information. The “eNet” User will determine the payment methods that it enables you to use, and the payment method information that we collect will depend upon the payment method that you choose to use from the list of available payment methods that are offered to you by the “eNet” User. When you make a transaction, we may also receive your name, email, billing, or shipping address and in some cases your transaction history to authenticate you.

When we conduct fraud monitoring, prevention, and detection activities, we may also receive Personal Data about you from our business partners, financial service providers, identity verification services, and publicly available sources (e.g., name, address, phone number, country), as necessary to confirm your identity and prevent fraud. Our fraud monitoring, detection and prevention services may use technology that helps us assess the risk associated with an attempted transaction that is enabled on the “eNet” User’s website or the application that collects information.

You may also choose to submit information to us via other methods, including: (i) in response to marketing or other communications, (ii) through social media or online forums, (iii) through participation in an offer, program, or promotion, (iv) in connection with an actual or potential business relationship with us, or (v) by giving us your business card or contact details at trade shows or other events.

Information that we collect automatically on our Sites.

Our Sites use cookies and other technologies to function effectively. These technologies record information about your use of our Sites, including:

- Browser and device data, such as IP address, device type, operating system and Internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons, and the language version of the Sites you are visiting.
- Usage data, such as time spent on the Sites, pages visited, links clicked, language preferences, and the pages that led or referred you to our Sites.
- We also may collect information about your online activities on websites and connected devices over time and across third-party websites, devices, apps and other online features and services. We use Google Analytics on our Sites to help us analyze Your use of our Sites and diagnose technical issues.
- To learn more about the cookies that may be served through our Sites and how You can control our use of cookies and third-party analytics, please see our Cookie Policy.



PRIVACY POLICY

3. HOW WE USE PERSONAL DATA

a. Our products and services.

We rely upon several legal grounds to ensure that our use of your Personal Data is compliant with applicable law. We use Personal Data to facilitate the business relationships we have with our Users, to comply with our financial regulatory and other legal obligations, and to pursue our legitimate business interests. We also use Personal Data to complete payment transactions and to provide payment-related services to our Users.

Contractual and pre-contractual business relationships.

We use Personal Data for the purpose of entering business relationships with prospective “eNet” Users, and to perform the contractual obligations under the contracts that we have with “eNet” Users. Activities that we conduct in this context include:

- 1) Creation and management of “eNet” accounts and “eNet” account credentials, including the evaluation of applications to commence or expand the use of our Services;
- 2) Creation and management of “eNet” Checkout accounts;
- 3) Accounting, auditing, and billing activities; and
- 4) Processing of payments with “eNet” Checkout, communications regarding such payments, and related customer service.

Legal and regulatory compliance.

We use Personal Data to verify the identity of our Users to comply with fraud monitoring, prevention and detection obligations, laws associated with the identification and reporting of illegal and illicit activity, such as AML (Anti-Money Laundering) and KYC (Know-Your-Customer) obligations, and financial reporting obligations. For example, we may be required to record and verify a user’s identity for the purpose of compliance with legislation intended to prevent money laundering and financial crimes. These obligations are imposed on us by the operation of law, industry standards, and by our financial partners, and may require us to report our compliance to third parties, and to submit to third party verification audits.

Legitimate business interests.

We rely on our legitimate business interests to process Personal Data about you.

The following list sets out the business purposes that we have identified as legitimate. In determining the content of this list, we balanced our interests against the legitimate interests and rights of the individuals who’s Personal Data we process. We:



PRIVACY POLICY

- 1) Monitor, prevent and detect fraud and unauthorized payment transactions;
- 2) Mitigate financial loss, claims, liabilities, or other harm to Users and “eNet”;
- 3) Respond to inquiries, send service notices, and provide customer support;
- 4) Promote, analyze, modify, and improve our products, systems, and tools, and develop new products and services;
- 5) Manage, operate, and improve the performance of our Sites and Services by understanding their effectiveness and optimizing our digital assets;
- 6) Analyze and advertise our products and services;
- 7) Conduct aggregate analysis and develop business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of, our business;
- 8) Share Personal Data with third party service providers that provide services on our behalf and business partners which help us operate and improve our business.
- 9) Ensure network and information security throughout “eNet” and our Services and Transmit Personal Data within our affiliates for internal administrative purposes.

Payment transactions and related services (“eNet” as a data processor).

As a processor of payment transactions, we use Personal Data of our User’s Customers to process online payment transactions and authenticate Customers on behalf of our Users. All such use is pursuant to the terms of our business relationships with our Users. In addition, we may offer payment-related services to Users who have requested such services, and our delivery of such related services to our Users may involve the use of Personal Data. For example, a “eNet” User may specify parameters for transactions submitted by its customers that determine whether the transactions are blocked or allowed by our platform. The entity responsible for the collection and use of Customer’s Personal Data in the context of payment transactions and payment-related services is the User.

If we need to use your Personal Data in other ways, we will provide specific notice at the time of collection and obtain your consent where required by applicable law.

“eNet” websites, applications, and services may contain links to third-party websites, products, and services. Our products and services may also use or offer products or services from third parties. Information collected by third parties, which may include such things as location data or contact details, is governed by their privacy practices. We encourage you to learn about the privacy practices of those third parties.

b. Marketing and events-related communications.

We may send you email marketing communications about “eNet” products and services, invite you to participate in our events or surveys, or otherwise communicate with you for marketing purposes, if we do so in accordance with the consent requirements that are imposed by applicable law. When we collect your business contact details through our participation at tradeshows or other events, we may use the information to follow-up with you regarding an event, send



PRIVACY POLICY

you information that you have requested on our products and services and, with your permission, include you on our marketing information campaigns.

c. Interest-based advertising.

When you visit our Sites or online services, both we and certain third parties collect information about your online activities over time and across different

sites to provide you with advertising about products and services tailored to your individual interests (this type of advertising is called “interest-based advertising”). These third parties may place or recognize a unique cookie or other technology on your browser (including the use of pixel tags). Where required by applicable law, we will obtain your consent prior to processing of your information for the purpose of interest-based advertising.

You may see our ads on other websites or mobile apps because we participate in advertising networks. Ad networks allow us to target our messaging to users based on a range of factors, including demographic data, users’ inferred interests and browsing context (for example, the time and date of your visit to our Sites, the pages that you viewed, and the links that you clicked on). This technology also helps us track the effectiveness of our marketing efforts and understand if you have seen one of our advertisements.

We work with Google AdWords, Double click, AdRoll and other advertising networks. To learn how to opt out of behavioral advertising delivered by Network Advertising Initiative member companies, please visit the Network Advertising Initiative and Digital Advertising Alliance. You may download the App Choices app to opt out in mobile apps. If you opt out from interest-based advertising, you may see advertising that is not relevant to you. At present, there is no industry standard for recognizing Do Not Track browser signals, so we don't respond to them.

4. HOW WE DISCLOSE PERSONAL DATA.

“eNet” does not sell or rent Personal Data to marketers or unaffiliated third parties. We share your Personal Data with trusted entities, as outlined below.

a. **“eNet”**. We share Personal Data with other “eNet” entities to provide our Services and for internal administration purposes.

b. Service providers.

We share Personal Data with a limited number of our service providers. We have service providers that provide services on our behalf, such as identity verification services, website hosting, data analysis, information technology and related infrastructure, customer service, email delivery, and auditing services. These service providers may need to access Personal Data to perform their services. We authorize such service providers to use or disclose the Personal Data only as necessary to perform services on our behalf or comply with legal requirements. We require such service providers to contractually commit to protect the security and confidentiality of Personal Data they process on our behalf.



PRIVACY POLICY

c. **Business partners.**

We share Personal Data with third party business partners when this is necessary to provide our Services to our Users. Examples of third parties to whom we may disclose Personal Data for this purpose are banks and payment method providers (such as credit card networks) when we provide payment processing services, and the professional services firms that we partner with.

d. **Our Users and third parties authorized by our Users.**

We share Personal Data with Users as necessary to maintain a user account and provide the Services. We share data with parties directly authorized by a User to receive Personal Data, such as when a User authorizes a third-party application provider to access the User's "eNet" account using "eNet" Connect. The use of Personal Data by an authorized third party is subject to the third party's privacy policy.

e. **corporate transactions.**

If we enter, or intend to enter in to, a transaction that alters the structure of our business, such as are organization, merger, sale, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets, or stock, we may share Personal Data with third parties for the purpose of facilitating and completing the transaction.

f. **We share Personal Data as we believe necessary:**

(i) to comply with applicable law, or payment method rules; (ii) to enforce our contractual rights; (iii) to protect the rights, privacy, safety, and property of "eNet", you or others; and (iv) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.

5. YOUR RIGHTS AND CHOICES.

You have choices regarding our use and disclosure of your Personal Data:

- Opting out of receiving electronic communications from us. If you no longer want to receive marketing-related emails from us, you may opt-out via the unsubscribe link included in such emails. We will try to comply with your request(s) as soon as reasonably practicable. Please note that if you opt-out of receiving marketing-related emails from us, we may still send you important administrative messages that are required to provide you with our Services.
- How you can see or change your account Personal Data. If You would like to review, correct, or update Personal Data that You have previously disclosed to us, you may do so by signing in to your "eNet" account or by contacting us.



PRIVACY POLICY

- Your data protection rights. Depending on your location and subject to applicable law, you may have the following rights about the Personal Data we control about you:
 - 1) The right to request confirmation of whether “eNet” processes Personal Data relating to you, and if so, to request a copy of that Personal Data;
 - 2) The right to request that “eNet” rectifies or updates your Personal Data that is inaccurate, incomplete, or outdated;
 - 3) The right to request that “eNet” erase your Personal Data in certain circumstances provided by law;
 - 4) The right to request that “eNet” restrict the use of your Personal Data in certain circumstances, such as while “eNet” considers another request that you have submitted (including a request that “eNet” make an update to your Personal Data); and
 - 5) The right to request that we export to another company, where technically feasible, your Personal Data that we hold to provide Services to you.
 - 6) Where the processing of your Personal Data is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your Personal Data on grounds relating to your situation.
- Process for exercising data protection rights. To exercise your data protection rights, you may contact “eNet” as described in the Contact Us section below. We take each request seriously. We will comply with your request to the extent required by applicable law. We will not be able to respond to a request if we no longer hold your Personal Data. If you feel that you have not received a satisfactory response from us, you may consult with the data protection authority in your country.
- For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. If we no longer need to process Personal Data about you to provide our Services or our Sites, we will not maintain, acquire, or process additional information to identify you for the purpose of responding to your request.
- If you are a customer of a “eNet” User, please direct your requests directly to the User. For example, if you are making, or have made, a purchase from a merchant using “eNet” as a payment processor, and you have a request that is related to the payment information that you provided as part of the purchase transaction, then you should address your request directly to the merchant.

6. SECURITY AND RETENTION.

We make reasonable efforts to ensure a level of security appropriate to the risk associated with the processing of Personal Data. We maintain organizational, technical, and administrative measures designed to protect Personal Data



PRIVACY POLICY

within our organization against unauthorized access, destruction, loss, alteration, or misuse. Your Personal Data is only accessible to a limited number of personnel who need access to the information to perform their duties. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please contact us immediately.

If you are a “eNet” User, we retain your Personal Data if we are providing the Services to you. We retain Personal Data after we cease providing Services to you, even if you close your “eNet” account, to the extent necessary to comply with our legal and regulatory obligations, and for the purpose of fraud monitoring, detection, and prevention. We also retain Personal Data to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods that we support. Where we retain data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.

7. COOKIES AND OTHER TECHNOLOGIES.

“eNet”’s website, online services, interactive applications, email messages, and advertisements may use “cookies” and other technologies such as pixel tags and web beacons. These technologies help us better understand user behavior, tell us which parts of our websites people have visited, and facilitate and measure the effectiveness of advertisements and web searches. We treat information collected by cookies and other technologies as non-personal information. However, to the extent that Internet Protocol (IP) addresses or similar identifiers are considered personal information by local law, we also treat these identifiers as personal information. Similarly, to the extent that non-personal information is combined with personal information, we treat the combined information as personal information for the purposes of this Privacy Policy.

8. USE BY MINORS.

The Services are not directed to individuals under the age of thirteen (13), and we request that they not provide Personal Data through the Services.

9. UPDATES TO THIS PRIVACY POLICY AND NOTIFICATIONS.

We may change this Privacy Policy from time to time to reflect new services, changes in our Personal Data practices or relevant laws. The “Last updated” legend at the top of this Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy on the Services. We may provide you with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on our website and, if you are a User, by contacting you through your “eNet” Dashboard, email address and/or the physical address listed in your “eNet” account.

10. LINKS TO OTHER WEBSITES.

The Services may provide the ability to connect to other websites. These websites may operate independently from us and may have their own privacy notices or policies, which we strongly suggest you review. If any linked website is not owned or controlled by us, we are not responsible for its content, any use of the website or the privacy practices of the operator of the website.

11. CONTACT US

If You have any questions or complaints about this Privacy Policy, please contact us electronically or send physical mail to:

Email: info@e.net.kw

Address: Behbehani Complex, 15 Floor, Jaber al Mubarak St., Sharq, P.O. Box: 1459 Safat, 13015

All such communications are examined and replies issued where appropriate as soon as possible. If you are unsatisfied with the reply received, you may refer your complaint to the relevant regulator. If you ask us, we will endeavor to provide you with information about relevant complaint avenues which may be applicable to your circumstances.