



Optal Group Privacy Policy

1. About this Privacy Policy

1.1 This is the Privacy Policy of the following Optal Group of companies:

Company Name	Registration number	Registered Address
Optal Limited	5531282	27-28 Eastcastle Street London W1W 8DH United Kingdom
Optal Financial Limited	8364883	27-28 Eastcastle Street London W1W 8DH United Kingdom
Optal Asia Limited	2189337	36F Tower Two Times Square 1 Mathesons St Causeway Bay Hong Kong
Optal Australia Pty Ltd	614 774 248	31 Queen Street Melbourne Victoria 3000 Australia
Invapay Payment Solutions Limited	6402512	27-28 Eastcastle Street London W1W 8DH United Kingdom

Each entity is herein referred to as **Optal, we, us or our**. Note that the main part of this Privacy Policy applies with respect to each and every Optal Group entity listed in paragraph 1.1, and any additional local law requirements which may apply to one particular entity due to its place of incorporation or area of activity are specified in the addenda at the end of the policy.

1.2 By:

- (a) browsing <http://optal.com>; or
- (b) browsing <http://invapay.com>; or
- (c) signing up to receive our newsletter; or
- (d) completing an application at <https://www.registration.optal.com/register/issuer>; or
- (e) using our payment and execution services; or
- (f) entering into another agreement with us,

you are accepting and consenting to the practices described in this policy.

1.3 We have implemented this Privacy Policy to provide information about what kinds of Personal Information we may collect or hold, how we collect, hold, use and disclose that Personal Information, choices you have regarding our use of that Personal Information, and your ability to access or correct that Personal Information. If you have any queries regarding this Privacy Policy, you should contact our Privacy Officer in the way specified in paragraph 14.

2. Personal Information

- 2.1 "Personal Information" is information which relates to a living individual who can be identified from that information or from that information and other information which is in our possession, or is likely to come into our possession and includes any expression of opinion about the individual and any indication of our intentions or the intentions of any other person in respect of the individual.

3. What Personal Information do we collect and hold?

- 3.1 The types of Personal Information we may collect about an individual will depend upon the nature of our interaction with them. Personal Information that we collect may include (but is not limited to) the following:

- (a) full name;
- (b) age and/or date of birth;
- (c) contact details including telephone numbers (landline, fax number and/or mobile);
- (d) current residential address (including postal address);
- (e) email address;
- (f) gender;
- (g) payment details, such as your credit card or bank account details;
- (h) occupation and employment details including income details;
- (i) information from your resume or job application if you apply for a job with us;
- (j) nationality;
- (k) identification documentation details (e.g. passport or national ID card number);
- (l) criminal record check results;
- (m) shareholding/proprietorship in relevant companies/businesses; and
- (n) information about your usage of our website(s) and your interest in the Optal products and services, through web tracking software; and/or when you report a problem with our site. This may include the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products or services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number. Also technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform.

- 3.2 We collect and record Personal Information about individuals such as:

- (a) our customers and their suppliers, potential customers and their representatives, employees, directors, partners, proprietors, shareholders or other beneficial owners;
- (b) our customers' clients;
- (c) our suppliers and potential suppliers and their representatives, directors, partners, proprietors, shareholders or other beneficial owners;
- (d) contractors and potential contractors and their representatives providing goods and services to us;
- (e) our employees past and present, including applicants; and
- (f) any other person who comes into contact with Optal.

4. How and when do we collect Personal Information?

- 4.1 We collect your Personal Information to allow us to conduct our organisational functions, to provide, market and sell our products and services and for the specified purposes set out in paragraph 6.

- 4.2 We may collect your Personal Information:

- (a) in the course of providing you with our products or services;
- (b) when you provide us, or you offer or apply to supply us, with goods or services;
- (c) when you provide information to us in any way (including by completing a form, disclosing information over the phone or via email, or providing us a business card);

- (d) when you request information about us, our products or our services;
 - (e) when you provide feedback to us;
 - (f) when you browse or fill in a form on our website;
 - (g) when you visit premises from which we operate;
 - (h) when you (or your employer) provide that information to us in the course of conducting or administering our relationship with you, or when you are carrying out activities in connection with our operations;
 - (i) when you submit a job application to us;
 - (j) when you otherwise contact us by telephone, fax, email, social media, post or in person;
 - (k) when we carry out background verification checks on you;
 - (l) when you register to use our services through our platform or website;
 - (m) when you subscribe to our service;
 - (n) when you place or accept an order on our website or platform;
 - (o) when you report a problem with our service or our platform or website;
 - (p) through us working closely with third parties (including, for example, business partners, suppliers and subcontractors in technical, payment and fulfilment services, advertising networks, analytics providers, search information providers, credit reference agencies and fraud prevention agencies or other similar organisations - who may check the information against any particulars on the Electoral Register and any other databases) and may receive information about you from them; or
 - (q) where we are otherwise required or authorised by law to do so.
- 4.3 Generally, when providing our products and services, dealing with our personnel, or obtaining goods and services from our service providers, suppliers or contractors, we collect personal information directly from the relevant individual where reasonable and practicable.
- 4.4 Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy and security policies and procedures and that we do not accept any responsibility or liability for these policies and procedures or for your or your Personal Information's security whilst you are visiting these websites. Please check these policies before you submit any Personal Information to these websites.
- 4.5 We may also collect Personal Information about you from your employer, if your employer has engaged us to provide services to them.
- 4.6 We may also collect Personal Information about you if you use any of the other websites or platforms we operate or the other services we provide. In this case, we will have informed you when we collected that data that it may be shared internally and combined with data collected on our websites. We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them.
- 4.7 The Personal Information we collect may include sensitive personal information, including health information and biometric information. We will ask for your consent to collect sensitive information, unless the law allows us to collect it without your consent.
- 4.8 Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you.
- 4.9 In most cases, if you choose not to provide your Personal Information to us for the purposes set out in this Privacy Policy, or if we do not or are unable to collect the Personal Information we may not be able to provide you with access to Optal's services.
- 4.10 Where you provide Personal Information relating to others (e.g. beneficial owners' details, business representatives' details, supplier who is to be paid) you confirm that you have their consent and/or you will inform that person about us or are otherwise entitled to provide this information to us and for us to use it in accordance with this Privacy Policy.

5. Cookies

5.1 Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. The tables below explain the cookies we use and why.

5.2 Cookies used when you register for one of our products:

Cookie	Purpose
XSRF-TOKEN	Protects against Client Side Cross Site Scripting.
__RequestVerificationToken	Protects against Server Side Cross Site Scripting.
incap_ses_*_*	Utilized for site security by our WAF (Web Application Firewall) – Imperva Incapsula
visid_incap_*	Utilized for site security by our WAF (Web Application Firewall) – Imperva Incapsula

5.3 Cookies which may be used when you have registered for one of our products and have been provided with login details by us:

Cookie	Purpose
communityId	Keeps track of the community for the currently logged in user
identity	Keeps track of the name of the currently logged in identity.
JSESSIONID	The session id for the current session.
AWSELB	Stores the server assigned to the current session and allows the balancer to forward the requests to the correct server
serverTime	Sets the session start time to calculate the session inactivity time
sessionExpiryTime	Stores the session expiry time to display message to user when timeout approaches and forces a session logout after 15 minutes of inactivity
clientTimeOffset	Stores the difference between the user local time and server time to calculate the correct session timeout value
lastActivity	Stores the last activity time to display message to use when timeout approaches and forces a session logout after 15 minutes of

	inactivity
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You can prevent the installation of the cookies by selecting the appropriate settings on your browser. You can also delete cookies already stored on your computer by following the applicable browser menu instructions.

If you do so however, you may not be able to access or take full advantage of all our website services.

6. How do we use your Personal Information?

6.1 We use the Personal Information we collect about you for our organisational functions and activities, in order to operate our business efficiently, and to market our products and services for the benefit of our customers.

6.2 We may collect, hold and use your personal information:

- (a) for identification and verification purposes in connection with the products and services that we may supply to you;
- (b) to identify you and communicate with you;
- (c) to enable us to provide you with requested information, products or services, including sending you reminders;
- (d) to otherwise assist you by providing you with information and support;
- (e) to collect, make and process payments;
- (f) to manage and administer any account you may hold with us;
- (g) to administer the relationship between you and us;
- (h) to carry out our obligations arising from any contracts entered into between you;
- (i) to notify you about changes to our products or services or to our contract terms and conditions;
- (j) to promote and market our products and services to you and to provide you with information that we believe may be of interest to you or that you may be interested in receiving, including advertising material, regarding us, our customers, and our business partners;
- (k) to conduct research for the purposes of improving existing products or services or creating new products or services;
- (l) to carry out statistical analysis and business reporting, provided that the information is aggregated and de-identified such that no individual may be identified from that information even when combined with other information;
- (m) to measure or understand the effectiveness of advertising we serve to you and others and to deliver relevant advertising to you
- (n) to make suggestions and recommendations to you and other users of our website(s) about product and services that may interest you or them.
- (o) to help us research the needs of our customers to enable us to market our products and services with a better understanding of your needs and the needs of customers generally;
- (p) to help us manage our business operations;
- (q) for business support purposes including maintenance, backup and audit;
- (r) to process any job application submitted by you;
- (s) to respond to any queries or complaints you may have;
- (t) to enhance the user experience of our website(s) by displaying more relevant information and options to customers;
- (u) to allow you to participate in interactive features of our service;
- (v) to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical analysis and survey purposes;
- (w) to assist with keeping our website(s) safe and secure;
- (x) to comply with our statutory and legal obligations or requests from any court, authority or governmental body of any jurisdiction
- (y) in order to establish, exercise, defend, protect, preserve or establish Optal's legal or other rights, or those of our customers' or others; or

- (z) for the use of any of Optal's subsidiaries, associated companies and/or business associates in connection with any of the above purposes and/or any other related products and services such companies and associates may be offering to you from time to time.

6.3 You consent to us using your Personal Information in the above ways and as set out in this Privacy Policy.

6.4 We may otherwise collect, use or disclose your Personal Information where the collection, use or disclosure is:

- (a) in accordance with this Privacy Policy or any agreement you enter into with us; or
- (b) required or authorised by applicable law.

7. When do we disclose your Personal Information?

7.1 Optal may disclose, or provide access to, your Personal Information to third parties in connection with the purposes described in paragraph 4.1. Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to our related and Optal Group entities, to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).

7.2 We may also disclose your Personal Information to:

- (a) any of Optal's internal divisions, business units or departments;
- (b) your nominated representatives;
- (c) other organisations or individuals who assist us in providing services to you;
- (d) professional service providers and advisors who perform functions on our behalf, such as lawyers;
- (e) medical providers including medical and rehabilitation practitioners for assessing insurance claims;
- (f) representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing products or services or administering our business (such as for data storage or processing, printing, mailing, marketing, planning and product or service development);
- (g) analytics and search engine providers that assist us in the improvement and optimisation of our website; and
- (h) government, regulatory authorities and other organisations as required or authorised by law (such as the Police).

7.3 We may also disclose your personal information to a purchaser or potential purchaser in connection with the sale or potential sale of Optal, our business or any of our assets, including in insolvency, in circumstances which require the purchaser or potential purchaser to use such Personal Information consistently with this Privacy Policy.

8. Overseas disclosures

8.1 Some of your Personal Information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers. This may happen if:

- (a) our offices or related entities are overseas;
- (b) we outsource certain activities overseas;
- (c) transactions, information, services or products have an overseas connection; or
- (d) our computer systems including IT servers are located overseas.

8.2 You consent to the collection, use, storage, and processing of your Personal Information overseas as set out in this Privacy Policy.

8.3 In particular, your Personal Information may be disclosed to persons in Australia, Hong Kong, the European Economic Area, the United Kingdom, Singapore and the U.S.A and such other countries in which those parties or their, or our, computer systems may be located from time to time, where it may be used for the purposes described in this Privacy Policy. In these circumstances, you consent to the collection, use, storage and processing of your Personal Information in those countries.

9. Other uses and disclosures

9.1 We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Policy. If we do so, we will make it known to you at the time we collect, use or disclose your Personal Information.

10. Marketing

10.1 If you have provided your Personal Information to us for the purpose of receiving marketing material or general information about Optal's services, you consent to us using your Personal Information for sending you information, including promotional material, about us or our products and services, as well as the products and services of our related and Optal Group entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, SMS and MMS messages.

10.2 If you do not want to receive marketing information from us, please contact us using the contact details specified in paragraph 14.

11. Storage and security of Personal Information held by us

11.1 We aim to keep your Personal Information secure. Any Personal Information that is collected via our website or which is held on our computer systems is protected by safeguards including physical, technical (data encryption) and procedural methods. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your information transmitted to our site; any transmission is at your own risk. Once we have received your information we will use strict procedures and security features to try to prevent unauthorised access.

11.2 We will store Personal Information only for as long as it is reasonably necessary taking into consideration the term of your contractual relationship with Optal, Optal's need to answer queries, resolve problems, provide improved and new services and comply with legal requirements under applicable law(s) and those of our suppliers. This means that we may retain Personal Information for a reasonable period (in compliance with applicable law(s)) after you stop using Optal's services. After this period, we will take reasonable steps to destroy or permanently anonymise the Personal Information.

12. Access and updating your Personal Information

12.1 You are generally entitled to access Personal Information that we hold about you. If you request access to your Personal Information we will give you a description of it; tell you why we are holding it; tell you who it could be disclosed to; and let you have a copy of the information in an intelligible form. Optal may charge for providing access to this information, however such a charge will not be excessive and will be in accordance with applicable law.

12.2 With regards to paragraph 12.1 there may be some legal or administrative reasons to deny access. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where we are required by law to give those reasons.

12.3 A request for access can be made by contacting our Privacy Officer in the way specified in paragraph 14.

12.4 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete.

12.5 Please contact us in the way specified in paragraph 14 if you believe that the Personal Information is inaccurate, incomplete or out of date, and we will use all reasonable efforts to correct the information.

12.6 It would assist us to ensure we properly understand your request, and allow us to respond more promptly, if requests are made in writing and include as much detail as possible.

13. How do we deal with complaints?

13.1 If you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Policy, please contact our Privacy Officer in the way specified in paragraph 14 and advise us as soon as possible. We will investigate your queries and complaints within a reasonable period of time depending on the complexity of the complaint.

13.2 We will notify you of the outcome of our investigation.

14. What to do if you have a question, problem or want to contact us about our use of your Personal Information or this Privacy Policy?

14.1 If you:

- (a) have a query or concern about this Privacy Policy or our Personal Information handling processes
- (b) wish to make a complaint in relation to a breach of your privacy
- (c) would like to access your Personal Information held by us
- (d) would like to update or correct your Personal Information held by us, or
- (e) would like to opt out of direct marketing,

please contact our Privacy Officer by email at compliance@optal.com

This Privacy Policy was last updated on 13th November 2017. Any changes we may make to this Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our Privacy Policy.

Local Law Addenda

England & Wales

(Relevant where references in this Privacy Policy to “Optal” mean Optal Limited, Optal Financial Limited and Invapay Payment Solutions Limited.)

With regards to what constitutes Personal Information in paragraph 2.1, pursuant to the Data Protection Act 1998 and EU Directive 95/46, it includes all information relating to an identified or identifiable natural person who can be identified “directly or indirectly” from that information or from information and other information which is in our possession, or is likely to be in our possession.

For the purposes of the Data Protection Act 1998, Optal Limited, Optal Financial Limited and Invapay Payment Solutions Limited all of 27-28 Eastcastle Street, London, W1W 8DH are each a data controller.

We will only ever collect Sensitive Personal Information from our employees past and present, including applicants and will obtain your explicit consent to the collection, and processing of any Sensitive Personal Information we collect, that is, information relating to your health and/or criminal records. We will only use any Sensitive Personal Information we collect for the following purposes:

- a) for making medical insurance applications for employees;
- b) for assessing insurance claims we may need to provide your medical records to medical providers including medical and rehabilitation practitioners;
- c) the regulated financial services entities in the Optal Group may have regulatory requirements to run criminal records and other background checks on prospective employees.

With regards to the contact information stated in paragraph 14, should you wish to write to us, please do so at 17 Moorgate, London EC2R 6AR, for the attention of: Risk and Compliance.

Hong Kong

(Relevant where references in this Privacy Policy to “Optal” mean Optal Asia Limited.)

Personal Data (Privacy) Ordinance:

With regards to paragraph 9.1, your personal data collected will be used for the purpose for which the data is collected or for a directly related purpose. Otherwise, we will request you to provide a voluntary and explicit consent with a new purpose to us.

Personal Data (Privacy) (Amendment) Ordinance 2012:

With regards to paragraph 10.1, we must not use or provide your personal data to others for use in directing marketing without your consent or indication of no objection.

With regards to paragraph 10.2, despite your consent to use your personal data in direct marketing, we need to notify you of your opt-out right when using your personal data in this manner for the first time. On the other hand, you may require us to cease to so use the data at any time. Further, despite your consent for us to transfer your personal data to third parties for use in the latter's direct marketing activities, you may at any time require us to cease to transfer the data and to notify any person to whom your personal data has been so transferred to cease to use the data in direct marketing.

Australia

(Relevant where references in this Privacy Policy to "Optal" mean Optal Australia Pty Limited.)

With regards to what is stated in paragraph 8.3, note that this is without us being responsible under the Privacy Act 1988 (Cth) for such use (or for any breach). Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you may not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information. However, we will take all steps reasonably necessary to ensure that your Personal Information disclosed to third parties in the countries referenced above (outside of Australia) is treated securely and in accordance with this Privacy Policy.

U.S.A

(Relevant where references in this Privacy Policy to "Optal" mean Optal Financial Limited in relation to its money transmission activity in the U.S.A.)

a) Children's Online Privacy Protection Act

We provide our products and services to corporate clients for business use only. With regards to paragraph 3.1, we do not intend for our websites or online services to be utilised by anyone under the age of 13. We do not knowingly seek or collect Personal Information from users under the age of 13. If you are a parent or guardian and believe we may have collected information about a child, please contact our Privacy Officer as specified in paragraph 14. If we determine that we have inadvertently collected Personal Information from a user under the age of 13, we will promptly delete any and all such Personal Information from our records.

b) Do Not Track Requests

With regards to paragraph 5.1, our websites do not currently honour "Do not track" requests. Our websites do not allow third parties to gather information about you over time and across websites. You may, however, elect to disable cookies by utilising the corresponding settings in your web browser. Disabling cookies may prevent you from using certain functions and features of our site.