



**ONEXENT TECHNOLOGIES LIMITED**  
**PRIVACY POLICY**

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## **1.0. INTRODUCTION**

Your privacy is important to us. This Privacy Policy describes how we collect, use and protect personal information that we receive from our customers in connection with the services we provide.

Centiwise offers a technology that enables businesses to collect and disburse payments in a simple, secure and a reliable manner. We value the privacy of our customers and parties who use our website and related sites, applications, services and tools.

## **2.0. PURPOSE OF THIS PRIVACY POLICY**

This Privacy Policy highlights what type of personal information we collect from our customers in order to provide our services and how they are used.

You are therefore advised to read this Privacy Policy together with any other information we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

## **3.0. INFORMATION WE COLLECT**

We collect personal information from our customers in order to provide our services. We collect information such as customer name, registration information, location information, contact information including email address and phone numbers, transaction history, among other information that is useful for provision of services to our customers.

## **4.0. WHAT WE MIGHT NEED FROM YOU**

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

## **5.0. HOW THE PERSONAL INFORMATION WE COLLECT IS USED**

Centiwise collects and uses information/data collected for the following purpose:

- 5.1 Prevent, detect, and manage risk against fraud, financial losses for you, us, and our Business, and illegal activities using internal and third-party screening tools.
- 5.2 Compliance with Legal Obligations- We use Personal data to meet our contractual and legal obligations related to anti-money laundering, Know-Your-Customer (KYC) laws, anti-terrorism, export control and prohibitions on doing business with restricted persons or in certain business areas and other legal

obligations. We strive to make our Services safe, secure, and compliant, and the collection and use of Personal data is critical to this effort.

- 5.3 Create and manage any accounts and business you may have with us, verify your identity, provide our services, and respond to your inquiries.
- 5.4 Process your payment transactions, this also includes chargebacks and other related dispute resolution activities.
- 5.5 Verifying your identity information through publicly available and/or restricted government databases to comply with applicable regulatory requirement.
- 5.6 In business practices including quality control, training, ensuring effective systems operations, to improve our website, products or services, and user experiences through gathering of feedback.

## **6.0. DISCLOSURE OF INFORMATION**

Centiwise does not sell, trade, or rent personal data to anyone. Further, we will not share or disclose your personal data with a third party without your consent except as necessary to provide the Services or as described in this Privacy Policy. We may have to share your personal data with the parties set out below for various reason.

Disclosure of your information shall be in accordance with applicable law and regulations. Centiwise shall assess and review each application for information and may decline to grant such information to the requesting party.

We may disclose your information to:

- 6.1 Law-enforcement agencies, regulatory authorities, courts, or other statutory authorities in response to a demand issued with the appropriate lawful mandate.
- 6.2 Our subsidiaries, Associates, Partners, Software Developers or Agents who are involved in delivering Centiwise services you order or use.
- 6.3 Fraud prevention and Anti money laundering agencies.
- 6.4 Publicly available and/or restricted government databases to verify your identity information to comply with regulatory requirements.
- 6.5 Service providers that we may share personal data with such as Vendors or Agents working on our behalf for the purposes described in this statement. For example, companies we've hired to provide customer service support, to assist in protecting and securing our systems and services, or to perform sanctions screening and identity verification services may need access to personal data to provide those functions.

6.6 Financial services & payment processing-When you provide payment data, we will share payment and transactional data with banks and other entities as necessary for payment processing.

## **7.0. STORAGE LIMITATION AND ITS DETERMINANTS**

By law we must keep basic information about our members (including Contact, Identity, Financial and Transaction Data) for 7 years after they cease being members or after completion of the transaction. Centiwise is statutorily obliged to retain the data you provide to process transactions, ensure settlements, make refunds, identify fraud and to comply with applicable laws, tax, reporting and regulatory guidelines.

### **7.1. Period for storing Information.**

- 7.1.1 As long as reasonably necessary for the purpose of providing our services to you.
- 7.1.2 For the duration your account is active, and we have your consent.
- 7.1.3 For the period needed to comply with our legal and statutory obligations
- 7.1.4 As needed to verify your information with a Financial Institution

### **7.2. Determinants of storage length:**

- 7.2.1 The contract terms agreed between Centiwise and the Merchant or if it is needed for the purpose for which it was obtained,
- 7.2.2 Whether the transaction or relationship has statutory implication or a required retention period
- 7.2.3 Whether there is an express request for deletion of personal data by the Merchant, provided that such request will only be treated where the Data Subject is not under any investigation which may require Centiwise to retain such personal data, or there is no subsisting contractual arrangement with the Data Subject that would require the processing of the personal data.
- 7.2.4 Whether Centiwise has another lawful basis for retaining that information beyond the period for which it is necessary to serve the original purpose.

## **8.0. DATA SECURITY**

We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used, or accessed in an unauthorized way, altered, or disclosed. In addition, we limit access to your personal Data to those employees, agents, contractors who require it to fulfill their job responsibilities and other third parties who have a business need to know. They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

In compliance with the Payment Card Industry Data Security Standard (PCI DSS Requirements), we implement access control measures, security protocols and standards including the use of encryption and

firewall technologies to ensure your card information and any other personal information shared with us is safe and secure in our servers, additionally, we implement periodical security updates to ensure that our security infrastructures are in line with industry standards.

## **9.0. YOUR RIGHTS**

Centiwise shall keep records of personal data processing activities and develop appropriate procedures to ensure it can satisfy your rights as a data subject where applicable, namely:

- 10.1 Right to request correction of the personal data that we hold about you, update your personal data that is inaccurate, incomplete, or outdated information,
- 10.2 Right to request restriction of processing of your personal data and erasure,
- 10.3 Right to request the movement of data from Centiwise to a third party,
- 10.4 Right to object to direct marketing, and to request that Centiwise restricts the processing of their information,
- 10.5 Right to opt out at any point they feel uncomfortable,
- 10.6 Right to request access to your personal data (commonly known as a "data subject access request

## **10.0. CHANGES TO THIS POLICY**

We may need to update, modify, or amend our Privacy Policy as our technology evolves and as required by law. If we materially change the ways in which we use or share personal data previously collected from you through our Services, we will provide notice or obtain consent regarding such changes as may be required by law. The Privacy Policy will apply from the effective date provided on our website.

## **11.0 WEB BROWSER COOKIES**

Cookies are small files placed on your computer, mobile phone or tablet which can log certain information about your visit. This information is often essential to the smooth operation of a website, for example a cookie may store the items you have in a shopping cart or your user details for a password protected area of a website. You can turn off cookies although we do not recommend this as it can cause some websites to operate incorrectly.

## **12.0 HOW TO CONTACT US**

If you have any questions relating to this Privacy Policy, complaints, need clarification or would like to find out more about exercising your data privacy rights, please reach out to us via email at [info@centiwise.com](mailto:info@centiwise.com)