



Privacy Policy

AiFi's White Label App (WLA)

This privacy statement applies to the processing of all personal data and personal information (as defined below) of users of AiFi's White Label App (hereinafter referred to as the "App") and its purpose is to be transparent about the way we collect, use, and protect your personal data and personal information.

❖ *What is personal data?*

The General Data Protection Regulation (GDPR) states that personal data is any information about an identified or identifiable natural person. This means that information is either directly about someone or can be traced back to this person.

❖ *What is personal information?*

The California Consumer Privacy Act (CCPA) as amended by the California Privacy Rights Act (CPRA) defines "personal information" as information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household.

❖ *About us*

AiFi Inc. ("AiFi" "we" "our" or "us") provides the App as a processor on behalf of our client ("Controller" or "client"). Our client is the data controller for personal data processed through your use of the App. Please contact the relevant Controller for any questions regarding this privacy statement.

❖ *For what purposes do we process personal data and information?*

AiFi may process the following types of personal data and personal information required solely on behalf of our client and in accordance with their instructions, such as: i) contact information, such as name, address, email address, password, and telephone number, and ii) Payment/ Shopper's Credit Card Information, such as BIN, the expiration date, and the last 4 digits (only applicable to the Credit Card and Web Receipt flow). As a data processor, we process personal data only on the documented instructions of our client, the data controller, and in accordance with the principles of data minimization.

For more information on how AiFi processes personal data and information, see AiFi's [website](#).

❖ *Rights of EU Residents under GDPR*

If you are a resident of the European Union, you have the right to be well informed about what our client and we do with your personal data and why your personal data is required. We do this through this Privacy Policy. In addition to the right to be informed, you have the following rights:

- Right to access (if you want to know which personal data is collected about you);
- Right to rectification (we are happy to adjust any personal data that is no longer correct);
- Right to be forgotten (in some cases you can ask for the deletion of your personal data);
- Right to restrict processing (in some cases you can ask for restrictions on the processing of your personal data);
- Right to data portability (if you want, your employer can pass on your personal data to another party or give you a copy of your personal data);
- Right to object (in some cases you can object to the use of your personal data).

If you want to exercise one of your rights, you can contact our client.

❖ *Who do we share personal data with and where do we store it?*

AiFi (as processor) may, in accordance with our client's instruction, gain access to your personal data in the App.

Our client may be obliged to provide certain personal data to third parties, such as government agencies, in accordance with relevant legislation. It may also be necessary for our client to transfer your personal data to protect its lawful rights, again in accordance with relevant legislation.

❖ *How long do we keep your personal data?*

We keep your personal data as long as necessary for the purpose for which we use it and/or as long as the law requires us to keep it. Depending on the use, that time varies from a few months to many years. For more information on how long we keep your data, see AiFi's [Website](#).

❖ *How do we protect your personal data?*

Under Article 32 GDPR, we are obliged to take appropriate technical and organizational measures to prevent loss of personal data or unlawful processing. Your personal data is secured through appropriate physical, administrative, organizational and technical measures, including: encryption of data in transit and at rest, access controls, regular security assessments, and employee training on data protection.

❖ *Notice to California Residents*

This notice to California residents is provided under the CPRA.

We collect the following categories of personal information through the App: i) contact information, such as name, address, email address, password, and telephone number, and ii) Payment/ Shopper's Credit Card Information, such as BIN, the expiration date, and the last 4 digits (only applicable to the Credit Card and Web Receipt flow). See the description of personal data above for more information. This information is collected from the sources and for the purposes more fully described above. We do not sell, rent, or lease your personal information to third parties.

You have the following rights under CPRA with respect to your personal information:

- The right to know about the personal information that our client and AiFi collects about you and to know how it is used and shared;
- The right to delete personal information collected from you consistent with applicable law;
- We do not sell your personal information to third parties, but you have the right to opt-out of the sale or sharing of your personal information;
- The right to non-discrimination in exercising your rights;
- The right to correct inaccurate personal information that our client has about you; and
- We do not collect sensitive personal information (as that term is defined in the CPRA).

If you have any questions about your rights under CPRA or AiFi's processing of your personal information please contact the relevant Controller.

❖ *Making Access and Deletion Requests*



To make an access or deletion request, please contact the relevant Controller. Before completing your request, they may need to verify your identity. Our client may request additional documentation or information solely for the purpose of verifying your identity.

❖ **Instructions for Authorized Agents Making Access and Deletion Requests**

Requests to exercise data subject rights may be submitted through an authorized agent. Authorized agents should contact the appropriate data controller and be prepared to provide documentation verifying their authorization to act on behalf of the data subject. Processes for submitting requests through authorized agents may vary by data controller and are typically outlined in the controller's internal privacy policies.

❖ ***Contact and Complaints***

Questions or comments about this Privacy Policy, please contact the relevant Controller.

Complaints about, for example, the way we use personal data or information or how we respond to privacy-related questions, you can file a complaint with the European Union Data Protection Authority or the California Privacy Protection Agency, as applicable.

October, 2024