



Merchant Privacy Policy

Last Updated: March 6, 2025

When your business applies and/or becomes a Merchant with us, we appreciate that you (the Merchant's beneficial owners, directors, other employees or trustees) trust us with your personal data that we collect and handle.

Here we provide an overview of what personal data we collect from you and why, our handling practices, and your rights and choices.

This Policy applies to Tua Financial Technologies Ltd. and Tua Financial Technologies Holdings Inc., (collectively "Tua") and their affiliates and related companies (together, "we", "us" or "our"). [Insert name] acts as a Data Controller in accordance... The entity you are interacting with in your jurisdiction of residence as indicated above is collecting the personal data and will process it, but may share it with our entities as forth in this Policy.

What is personal data?

Personal data is any information that reasonably identifies you and is about you as described in our applicable privacy laws. Some examples of personal data are your name, home address, and date of birth.

Personal data we collect and why

During your Merchant acquisition process and throughout our business relationship, we may ask for your personal data directly from you or your business representative on your behalf where it is lawful to do so.

We may collect your personal data for the following purposes outlined in below, for compatible purposes, and where otherwise lawful to do so. We will collect, use or disclose your personal data only with your knowledge and consent, including as set out in this Policy, except where otherwise required or permitted by law.

If you are unable to provide the requested personal data for our purposes, or refuse to do so, we may not be able to do business with you, enter into or continue an agreement to access or provide our Services.

Category

Personal and contact details. For example, your name, date of birth, email address, business and residential address, location.

Purpose/s

To enter into and for the performance of your Merchant contract, and as required by law

We need to get in touch with you and discuss your business arrangement with us.

Once your business is approved, we will also set up your business' Service account, and use it to authorize discussions about your business' account with our customer support team.

As required by law. Refer to "Identifiers" below.

With your consent for marketing and research purposes

To conduct Merchant surveys

Our legitimate interests

Before you become a Merchant, we may collect this type of information from your business, publicly available (eg. Your website or LinkedIn), and other third party sources where



permitted to reach out and understand whether you may be interested in partnering with us.

We may search online for any publicly available information about you and any promotional material related to your business. Additionally, we may gather relevant details during our onboarding process.

To enhance our services and provide valuable opportunities, we may contact you with new partnership and promotional offers. Where permitted, you may be opted in, but you can unsubscribe at any time using the link provided in our messages.

Identifiers, including government issued documents. For example, a driver's license, passport, social security number, health or social insurance number, birth certificate, trust deed, or other agreed identity documentation.

To enter into a Merchant contract, and where required by law

With your personal details, we may ask for this information where permitted to verify your identity and support the partnership.

We do so as required and in accordance with applicable Anti-Money Laundering Counter Terrorism Financing Laws, Sanctions-related Laws, and internal risk policies. These include:

Anti-Money Laundering Laws under the Bank Secrecy and implementing regulations issued by the Financial Crimes Enforcement Network (FinCEN), 31 U.S.C. §§ 5311-32; 31 C.F.R. Ch. X

The provision of your identifiers is voluntary, but if you do not provide it to us when requested, we may not be able to verify your identity, and we may not be able to enter into a contract with your business.

Use of our information, communication, and transaction processing systems

For example, login sessions, information about your interactions with our Services, your bank account details

For performance of your Merchant contract, and our legitimate interests

To provide, maintain, and improve our services, including your service account and perform transactions

When you access or use your Service account we may collect personal data via the use of cookies and other web tracking technology, such as pixels or beacons, in order to take reasonable steps to ensure the security of our systems to help us deliver, maintain, and improve our Services. A cookie is a small text file saved on your computer, mobile device or browser when you visit us. Your browser may give you the ability to control your use of cookies. If you block all cookies, you may disrupt certain Service features, and limit the functionality we can provide.

When you interact with us through contacting our customer support team, suppliers or service providers to manage your account or respond to a query (whether by web form, mail, email or through telephone inquiries), and to deliver our partnership and promotion opportunities, such as the Merchant Retailer Program.

How your personal data is used and shared

We may use and share your personal data with the following categories of recipients where lawful to do so, including for the purposes outlined in "Personal data we collected and why". We do not sell your personal data.



When verifying your identity at any time and assessing your eligibility, we may share your personal data with credit reporting bodies, identity verification services, and/or other external agencies. We may collect responses as to whether you pose a fraud or money laundering risk, and whether you are listed on a government sanctions list. The searches we would make are “soft” searches and do not leave a footprint on your credit file.

We may also share your personal data with other Tua entities, affiliates, and with Suppliers and Service Providers for the provision, maintenance, and improvement of our Services. Personal data may be accessible by authorized employees and contractors as required for the purposes described in this Policy.

Where required, we may share your personal data with government, law enforcement, and regulatory authorities, or as otherwise required or authorized by law.

Cross border transfers

We may collect or transfer personal data across borders in a secure and lawful manner, within and externally to our company, including for purposes described in this Policy and as otherwise required or permitted by law. Your personal data may be transferred to countries that include the United States and Canada. We take necessary steps to require entities that deal with your personal data, by written agreement, to comply with a similar standard of compliance with applicable privacy requirements and to have appropriate safeguards.

How we keep your personal data safe

As part of our commitment to protection the security of any data we process, we have put in place physical, technical, and administrative security measures. We require our third parties to meet appropriate privacy and security standards when handling data on our behalf.

How we retain your personal data.

We will retain your personal data for as long as necessary to fulfill the purposes we collect it for. This includes where required under law, our legitimate interests, or for the establishment, exercise or defense of legal claims, and for reasons explained in “Personal data we collect and why” and “How your personal data is used and shared”. We will otherwise delete personal data where we no longer have a lawful basis.

When you provide your personal data to us to enter into and for the performance of a contract we will retain it for 7 years after the application is made or the termination of our agreement (where applicable), and where otherwise we have a lawful basis to do so. This includes for as long as is necessary for our legal and compliance reasons.

Your rights and choices

We respect your rights and choices you make. Your rights and choices are where applicable to you based on your location and which entity you are dealing with, and subject to limitations as required or permitted by law. They are set out below.

We may not always be able to fulfill your request if we have a legitimate basis to refuse it. We will tell you why. For example, if you seek to erase your personal data in a way that would mean we are not able to comply with our obligations under the law.

Right to	Description
Withdraw your consent	You have the right to withdraw your consent where we have relied on it. If you withdraw your consent, we may not be able to provide you with certain Services. It will not affect our lawful basis for processing by consent before your withdrawal.
Further Information	You have the right to inquire further about the personal data we hold about you and how we process it, including across borders.
Access	You have the right to request access to your personal data.



Correction	You have the right to ask us to correct your personal data, including where you believe it is not accurate, complete, up to date, or relevant.
Make an inquiry or complaint	You have a right to make an inquiry or complaint, including to lodge a complaint with your local privacy authority.
Erasure	You have the right to ask us to erase your personal data, and where personal data is made public, to inform other controllers of your personal data where you have a lawful erasure right.
Restrict Processing	You have the right to ask us to restrict processing of your personal data.
Object to processing	You have the right to object to us processing your personal data.
Portability	You have the right to ask us to access or transfer on your behalf personal data we hold about you to third party.

Contact Us

If you have a query or concern regarding the way we collect and handle your personal data, or would like to exercise your rights and choices, please contact our Tua Customer Care Team at Care@tuafinancial.com. You may alternatively contact our Compliance Manager at privacy@tuafinancial.com.

You can also alternatively reach out to our Data Security Officer at Admin@tuafinancial.com or the address below:

Data Security Officer
Tua Financial Technologies Ltd.
1489 W. Warm Springs Road, #110,
Henderson, NV 89104

We will respond to you in a timely manner. Tua will provide written acknowledgment of your correspondence within 7 days of receipt.

Where you have asked us to exercise a right or choice, we will review and advise you of the steps we have taken to respond within a reasonable and lawful time frame, and explain our process and reasons.

Changes to this Policy

The Policy will be reviewed regularly and updated as needed to reflect our current collection and handling practices. The updated version will be available by following the 'Merchant Privacy Policy' link on our Website. The revised version will be effective from the time we post it. We may notify you if we make material changes to this Policy.