

## GoGo2 PRIVACY POLICY

### 1. OVERVIEW

a) Your Data Controller the Electronic Money Institution (EMI) with which we are in cooperation (referred to as "EMI," "we," "our," "us," "Data Controller," or "Data Processor"). The specific EMI (to be disclosed in the Merchant agreement) acting as the Data Controller for your personal data will depend on the services you use and the legal relationship established. For details regarding the responsible EMI, please refer to the information provided in the respective service agreements and communications.

b) Your Data Processor is AJ Mercury Solutions Ltd, a company registered under company code HE394695, with a registered address at 67 Agias Fylaxeos St., Drakos House, 3025, Limassol, Cyprus. AJ Mercury Solutions Ltd assists customers in accessing EMI services and facilitating legal relationships between Clients and the EMI. As a registered intermediary, AJ Mercury Solutions Ltd also acts as a Data Processor.

Data Processor's details:

Name: AJ Mercury Solutions Ltd

Legal entity code: HE394695

Office address: 67 Agias Fylaxeos St. Drakos House, 3025, Limassol, Cyprus

Tel.: +357 99 94 18 82

E-mail: [support@gogo2.com](mailto:support@gogo2.com)

Link: <http://www.gogo2.com/>

This Privacy Policy of AJ Mercury Solutions Ltd (hereinafter referred to as "we," "our," "us," "Data Controller," or "Data Processor") outlines the purposes and legal bases for the collection, processing, and sharing of personal data provided by you or collected by us. This Privacy Policy applies each time you access our content and/or services, regardless of the device (computer, mobile phone, tablet, TV, etc.) you use.

We are committed to complying with applicable laws and regulations of the European Union as well as the guidelines of regulatory authorities. We have implemented reasonable technical and administrative measures to safeguard collected data against loss, unauthorized access, and alteration. Data retention is limited to necessary periods. Employees of the Data Processor and the responsible EMI are bound by written commitments to refrain from disclosing and distributing accessed information to third parties, including information about website/social media account visitors.

**Important Note:** Individuals under the age of 16 should not provide personal data through our website/social media accounts. If you are under 16, obtain parental or guardian consent before submitting personal information.

Definitions in this Privacy Policy align with General Data Protection Regulation No 2016/679 (EU).

Please carefully review this Privacy Policy. By accessing website <http://www.gogo2.com/>, or using services provided by the EMI, you agree to adhere to the terms outlined here. If you disagree with these terms, kindly refrain from visiting our website or utilizing our content and/or services.

## **2. COLLECTION METHODS FOR YOUR INFORMATION?**

### **Data Provided by You**

*This encompasses information provided directly by you, as well as data supplied by individuals associated with you, your business, or those acting on your behalf.*

- *When you apply for our products and services, you may furnish us with personal data by completing registration forms, submitting necessary documents for service provision, and more.*
- *Upon signing up on our website or installing our applications.*
- *Correspondence through emails, letters, or phone conversations, including recorded calls.*
- *Subscriptions to our newsletters or registration for other communications.*
- *Participation in surveys.*

**Important Note:** We may also gather your personal information if you have a connection to our clients or potential clients who are legal entities. In such instances, you might hold positions like company director, shareholder, board member, ultimate beneficial owner (UBO), or authorized company representative.

### **Automatically Collected Data**

*This pertains to information gathered about your interaction with our services and account activity.*

- *Data about your website usage (we employ cookies and similar technologies for this purpose.*
- *Inquiries made through our registration system or social media accounts.*
- *Payment and transaction details.*

*In certain scenarios, we might acquire information from third parties and gather data from publicly accessible sources (e.g., your LinkedIn profile, Facebook, Twitter, Instagram, your company's website, or other similar sources). Such information might also be shared by our partners and marketing agencies. We may combine this data with information provided by you and information obtained from or about you from other sources.*

*Furthermore, we might collect information about you in contexts not explicitly discussed in this Privacy Policy. In such cases, we will provide you with additional notice.*

### 3. DATA PROCESSING PURPOSES AND LEGAL FOUNDATIONS

In our efforts to minimize the collection of your information, the purposes for processing your personal data, along with the corresponding legal bases and the personal data collected for each purpose, are provided in the following table:

Purpose	Legal Basis/Bases	Personal Data
To provide payment and related services.	<ul style="list-style-type: none"> <li>- Fulfillment of contractual obligations between you and us.</li> <li>- Adherence to legislative mandates;</li> <li>- Our legitimate interests;</li> <li>- Your explicit consent.</li> </ul>	Name, surname, details about payments to and from your accounts with us, payment method, credit card number, address, passport number, credit card expiration date, details about the products or services we provide you, other information we may need in providing our services to you, such as your phone number or email address to which we will send your registration confirmation, information about your interests and preferences.

Purpose	Legal Basis/Bases	Personal Data
To provide service-related information you request.	<ul style="list-style-type: none"> <li>- Our legitimate interest to provide you with accurate information about our services, extra services, etc.;</li> <li>- Your consent;</li> <li>- Obligations under a contract between you and us.</li> </ul>	Inquiries through phone, email, social media, or other means, where we might require your phone number, email address, or other convenient contact details.
For marketing purposes, including customized advertisements, sponsored content, and promotional communications.	<ul style="list-style-type: none"> <li>- Legitimate interest to inform about our services, events, news, and other relevant information;</li> <li>- Additional explicit consent, obtained (e.g., through an additional tick box linked to the Privacy Policy and/or other relevant documents) prior to processing personal data for marketing purposes.</li> </ul>	Name, social media account details, telephone number, email address, your interests.

Purpose	Legal Basis/Bases	Personal Data
Assessment and analysis of market, clients, products, and services, including surveys.	<ul style="list-style-type: none"> <li>- Legitimate interest in improving services, developing content and products, and ensuring website security;</li> <li>- Your consent.</li> </ul>	IP address, device operating system version and settings, login session time and duration, search query terms, cookie information, GPS signal or nearby WiFi access point data when using our website content.
Conversation recording for service quality, transaction preservation, and handling of complaints, requests, or notifications.	<ul style="list-style-type: none"> <li>- Consent received during conversation continuation.</li> </ul>	Phone number, name, surname, call date, start and end times, conversation content.
To protect our interests in legal proceedings.	<ul style="list-style-type: none"> <li>- Compliance with legislative requirements;</li> <li>- Legitimate interest in defense against lawsuits and claims.</li> </ul>	Relevant personal data as stated in this Privacy Policy based on the lawsuit or claim.

**Opt-out of Marketing Communications:** If you wish to avoid receiving our direct marketing communications, you have the option to opt out at any time. Please inform us

by sending an email to [support@gogo2.com](mailto:support@gogo2.com) or by utilizing the opt-out link provided in our newsletters.

**Conversation Recording:** If you do not consent to having your conversations recorded, alternative methods for contacting GoGo2 are available. You can get in touch via email at [support@gogo2.com](mailto:support@gogo2.com).

In cases where our use of your information doesn't align with the legal bases mentioned earlier, we will seek your consent before proceeding with the processing. Such instances will be evident from the circumstances and context surrounding them.

On occasion, we may employ your information for purposes beyond those previously described. In such situations, we will provide you with an additional notice.

**Important Note:** You retain the right to withhold specific information from us (for instance, details requested in the registration form). However, this choice might lead to limitations. You might not be able to complete registration on our website or avail our services. It could also impact our ability to manage your accounts or policies, and may even result in the cancellation of a product or service you have with us.

#### 4. RETENTION PERIOD FOR YOUR PERSONAL DATA

We will retain your personal data for the duration necessary to fulfill the initial purpose for which they were collected. Following this, we will proceed to delete the data, unless legal obligations require us to retain information for tax purposes or for potential pre-trial investigations. Nonetheless, the retention period will not exceed 10 years subsequent to the conclusion of your client relationship. At the end of this period, the data will be permanently erased.

Ordinarily, the storage periods for personal data are as follows:

Personal Data	Retention Period
Payment data	At least 10 years after the payment transaction.
Personal data used for service provision	8 years after you cease being a client.
Personal data used for marketing purposes	3 years from your most recent visit to our website.
IT system logs	Typically, for a span of several months.
Analytical data	This data is routinely collected during website visits and is instantly anonymized/aggregated.

Personal Data	Retention Period
Conversation records	Kept for up to 3 years from the date of recording.
Correspondence with clients	Retained for 5 years after the termination of your client relationship.
Complaints	Maintained for a maximum of 10 years.

Please bear in mind that these retention periods are subject to the nature of the data and the respective legal requirements.

## 5. DISCLOSURE OF YOUR PERSONAL INFORMATION

We may (or are obligated to) share your personal data with external entities, including:

Companies that provide essential services for us, necessary for offering our services to you or adhering to legal obligations.

Banks and payment service providers facilitating transactions.

Public authorities, regulatory bodies overseeing payment sector activities, pre-trial investigation officials, courts, and similar parties when deemed necessary to safeguard our legitimate interests or when legal obligations mandate disclosure.

This practice enables us to provide products, services, and manage business operations while ensuring compliance with applicable regulations. We also engage various data processors for personal data processing as outlined in this Privacy Policy, which includes but is not limited to data centers, cloud service providers, website administration, marketing services, software development, IT infrastructure services, and communication services.

## 6. TRANSFER OF YOUR PERSONAL DATA ACROSS BORDERS

In certain cases, we may need to transfer your personal data to countries where data protection standards may not be as stringent. However, we take comprehensive measures to ensure the security of data during transfers.

The Data Controller transfers your personal data to countries outside the European Economic Area, including Israel and India. To ensure the safety of such transfers, we implement any of the following safeguards:

- Executing contracts with data recipients based on the standard contractual clauses adopted by the European Commission.

- Implementing binding corporate rules for data transmission within corporate groups.
- Engaging data recipients situated in countries recognized by the European Commission as maintaining adequate data protection standards (e.g., Israel).

## 7. SAFEGUARDING YOUR INFORMATION

We have implemented reasonable and suitable physical and technical measures to secure the information we gather in connection with our content and services. It's important to note, however, that despite our efforts to protect your data, no website, Internet transmission, computer system, or wireless connection can guarantee absolute security.

## 8. YOUR ENTITLEMENTS

The data subject whose data are processed in connection with activities carried out by the Data Controller holds the following rights based on their specific circumstances:

**Right to Know (Right to Information):** You possess the right to receive concise and straightforward information, using clear and plain language, before your personal data is processed.

**Right of Access:** This right entails:

- Confirming whether we process personal data related to you.
- Furnishing a list of your processed data.
- Providing details about processing methods, purposes, and legal bases.
- Verifying whether we transfer data to third parties and outlining safeguards implemented.
- Disclosing the source of your personal data.
- Informing you of profiling activities.
- Sharing information about storage duration. After verifying your identity, we will provide the aforementioned information, ensuring it doesn't infringe upon others' rights and freedoms.

**Right to Rectification:** You have the ability to correct or complete your personal data if it is inaccurate or incomplete, considering the purpose of processing.

**Right 'to be Forgotten' (Right to Erasure):** Applicable when:

- The information we possess is no longer necessary for its intended purpose.
- You withdraw consent given for processing.
- Your private interests override our legitimate interests following your objection.



- The information was unlawfully used.

**Right to Suspension of Processing (excluding storage):** Temporary suspension of data processing (excluding storage) during the investigation of your case if:

- You contest the accuracy of information.
- You object to processing based on legitimate interests.
- Our processing of your information is unlawful, and you oppose erasure.
- The information is no longer needed, but you require it for legal reasons.

**Right to Restriction of Processing:** You can opt out of us using your personal data for direct marketing purposes.

**Right to Object:** At any time, you can object to the processing of personal data based on public interest tasks, legitimate interests, or third-party pursuits. We must provide compelling legitimate grounds that supersede your interests, rights, and freedoms.

**Right to Data Portability:** This right can be exercised if you've provided your data to us, and processing is automated based on your consent or contractual obligations.

We provide user-friendly avenues to exercise these rights. You can do so by calling us at +357 99 94 18 82, emailing us at [support@gogo2.com](mailto:support@gogo2.com), or utilizing specific links provided in our promotional communications.

**Important Note:** There might be cases where you cannot exercise these rights due to legal requirements related to crime prevention, investigation, detection, protection of official or professional ethical standards, or safeguarding the rights and freedoms of yourself or others.

## CONTACT US

Should you identify any inconsistencies in this Privacy Policy, encounter security concerns on our website, or have queries regarding the processing of your personal data, please reach out using the contact details provided below:

Mailing Address: 67 Agias Fylaxeos St., Limassol, 3025, Cyprus;

Telephone: +357 99 94 18 82;

E-mail: [support@gogo2.com](mailto:support@gogo2.com)