

Privacy Notice eSimChoice

This privacy notice (“**Privacy Notice**”) explains how we process your personal data (“**Personal Data**”) while you use our services (collectively, “**Services**”) and when you browse our website (“**Website**”), whether as a customer, a visitor and/or a user of our Website, or however you might otherwise interact with us (collectively, “you”, “your” or “users”). In this Privacy Notice, we also describe whether your Personal Data is shared with other parties and the mechanisms we have in place to protect your data.

We encourage you to regularly review this Privacy Notice and check the Website/App for any updates. Updates to this Privacy Notice will be published on our Website, and by continuing to deal with us, you agree to this Privacy Notice and any future modifications.

By using our Website or from purchasing any product or service offered by us, you acknowledge that you have read, understand, and agree to be bound by this Privacy Notice. You should not provide us with any of your information if you do not agree with the terms of this Privacy Notice.

Who are we? We are eSimChoice a trading branch of transact Elektronische Zahlungssysteme GmbH and part of Euronet Worldwide Inc. (“Euronet Group”)	What type of Personal Data is collected? We collect only the Personal Data necessary to provide you with the Service and to comply with applicable law.
Why do we collect Personal Data? We collect Personal Data for specific contractual and legal purposes. With your consent, we also collect data for additional purposes.	How long does eSimChoice keep Personal Data? We keep Personal Data only for as long as necessary or as required by applicable law.
With whom do we share Personal Data? We share Personal Data with other Euronet Group companies, legal authorities, and partners where necessary to meet regulatory requirements or contractual commitments.	Where does eSimChoice store Personal Data? We store Personal Data in secure locations with strict security measures in place. If we need to transfer Personal Data to other locations, we take all necessary measures to comply with legal obligations and ensure a proper level of security.

What are your Personal Data rights?

Depending on where you live, you may have rights in relation to your Personal Data under applicable law. A description of common Personal Data rights is set out in section 15 below. To make a request, you may contact us by email to dpo@euronetworldwide.com.

Internal Appeals Process:

If you receive notice from us that your Personal Data rights request has been refused, you may appeal the refusal within a reasonable period after receiving the notice by sending an email to dpo@euronetworldwide.com.

1. Who are we?

eSimChoice is a trading branch of transact Elektronische Zahlungssysteme GMBH, a German company with company number HRB 114 439 whose registered office is at Fraunhoferstrasse 10, 82152 Martinsried, Germany. You may reach out to us at dpo@euronetworldwide.com.

2. What Personal Data is collected and why?

The categories, sources, and reason for collecting Personal Data are listed below. Where the collection of Personal Data is based on your consent, you may withdraw your consent at any time. eSimChoice does not and will not “sell” or “share” Personal Data, as those terms are defined under applicable laws. We retain Personal Data for as long as reasonably necessary to provide the Services and meet our legal obligations.

If you have questions or concerns regarding the processing of your Personal Data, you may contact us any time at dpo@euronetworldwide.com

Identification Data

The Personal Data we collect from you may include name, email, telephone and/or fax numbers, residential and/or business address and other contact data (“**Contact details**”), title, date of birth, gender, images, videos, or signature.

Where necessary, Identification data is only used for the described purposes.

Purpose for Processing	Legal Basis
To perform/supply the Services.	Contractual obligation
To provide customer service and record customers’ instructions, we will monitor and record (via automated means or transcripts) our telephone calls, emails, and chat conversations with you. We will use transcripts of these calls to confirm the instructions provided to us.	Contractual obligation Legitimate interest
To manage your account(s) (i.e.: registration, administration, maintenance and servicing accounts).	Pre-contractual/Contractual obligation

To provide advertising and marketing.	Consent Contractual obligation
To measure and evaluate your behavior using automated processing to provide you with a more personalized Service.	Consent
Your participation in events or giveaways: You may wish to take part in events organized by us or in a specific giveaway.	Consent

Behavioral and Technical Information

IP address, internet or other similar network, browsing, or search activity, behavioral information (to understand the way you behave while using our products and services), browser type and version, time zone setting, screen resolution settings, browser plug-in types and versions, operating system, and platform.

Purpose for Processing	Legal Basis
To perform analytics to measure the use of our website and Services, including number of visits, average time spent on the Website/App, pages viewed, page interaction data (such as scrolling, clicks, and mouse-hovers), etc., and to improve the content we offer to you.	Legitimate Interest
To undertake activities to verify or maintain the quality of the Service, and to improve, upgrade, or enhance the Service, including to administer the Website/App and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes.	Consent Legitimate Interest
To help ensure the safety and security of our Website/App.	Consent Legitimate Interest
To provide advertising and marketing, including measuring the impact of our emails.	Consent
To provide the Services, including to process the transaction.	Contractual obligation

Financial details

We collect your personal financial data when you make a purchase. We collect financial data such as credit/debit card information or other documentation to initiate the contractual relationship to provide you with our Services.

Supply of Services	• Contractual obligation
Managing your account	• Contractual obligation
To fulfill any legal and compliance obligations	• Legal obligation

Non-Identifiable Data

Whenever possible, we use data where you cannot be directly identified (such as anonymous demographic and usage data) rather than Personal Data (“non-identifiable data”). This non-identifiable data may be used to improve our internal processes or delivery of services, without further notice to you.

We may use aggregate data for a variety of purposes, including to analyze, evaluate and improve our Services.

3. Accuracy of Personal Data

We are committed to keeping your Personal Data accurate and up to date. We take reasonable steps to ensure the accuracy of your Personal Data by ensuring that the latest Personal Data we have received is accurately recorded and when considered necessary, we run periodic checks and request that you update your Personal Data. From time to time, we may send you an email asking you to confirm and/or update your Personal Data. This communication is based on our legitimate interest and legal obligation to maintain accurate and up to date information.

If you notice that your Personal Data is not accurate, you may request a correction or update your information by sending an email to dpo@euronetworldwide.com.

4. Legitimate Interest

When we use your Personal Data to pursue our legitimate interests, we will make every effort to match our interests with yours so that your Personal Data will only be used as permitted by relevant law, or when it will not adversely affect your rights. Upon request, customers may request information on any processing based on legitimate interest.

5. How long does eSimChoice keep your Personal Data?

Personal Data is kept for as long as it is necessary to provide the Services requested and to comply with applicable legal, accounting, or reporting obligations. The retention period is determined based on the applicable requirements and obligations, which may include:

- **Legal and Regulatory Requirements:** Your Personal Data is kept as long as necessary to comply with all our legal obligations including without limitation, commercial and tax regulations. While we store your Personal Data only for the purposes of complying with legal obligations, your Personal Data will be restricted such that it cannot be used for any other purposes. While restricted, only when necessary will your Personal Data be accessed. Whenever we receive a request for deletion, we will also maintain your Personal Data further to our legal obligations.

- **Customer Service and Contractual relationship (administration of customer relationship, complaint handling, etc.):** We will keep your Personal Data as long as you remain our customer. Once we consider our contractual relationship to be over, we will proceed to restrict your data to make it available only to comply with legal obligations as expressed above.
- **Marketing:** We will process your Personal Data for marketing purposes as long as you haven't asked us to opt-out, according to section 9 of this Privacy Notice or until we become aware that you are no longer interested or that your data is not accurate.

6. Does eSimChoice disclose Personal Data?

eSimChoice's disclosure of Personal Data for business purposes or to meet legal obligations are outlined below:

Euronet Group

Types of Personal Data	Purpose	Legal Basis
Identification Data Behavioural and technical Data	<p>We disclose your Personal Data with Euronet Worldwide Inc and Euronet Group affiliates for our affiliates' everyday business purposes and compliance with group obligations.</p> <p>As a result of a sale, acquisition, merger, or reorganization involving Euronet, a company within the Euronet Group, or any of their respective assets, we may transfer customer Personal Data to a third party. In doing so, we will take reasonable steps to ensure that their information is adequately protected.</p> <p>Your Personal Data is also disclosed in order to be able to provide you with customer service, regardless of when you require our help. To provide access to our 24/7 customer service, we must share your Personal Data with the Group affiliates.</p>	<p>Legal obligation Contractual obligation</p>

Third-Party Service Providers*

Types of Personal Data	Purpose	Legal Basis
Contact details. Behavioural and technical Data	To advertisers or advertising networks and social media companies to place personalized advertisements in digital services and to adapt to consumer preferences.	<p>Consent Contractual Obligation</p>

*The legal meaning and list of “third-party service providers” may vary depending on the country you are based. For additional information regarding which providers have access and why they have access to your Personal Data you may reach us at dpo@euronetworldwide.com.

Legal and Regulatory Authorities

Types of Personal Data	Purpose	Legal Basis
Identification Data	We may need to disclose your Personal Data if requested by a legal authority. We may share your Personal Data with legal authorities to enforce or apply our Terms and Conditions or any other agreement or understanding we may have with you.	Legal obligation Contractual obligation

Professional Partners

Types of Personal Data	Purpose	Legal Basis
Identification Data	We will share your Personal Data with advisers, lawyers, consultants, auditors or accountants in order to comply with our legal obligations and to provide our Services and our contractual obligations and best practices.	Legitimate interest

7. Minors

We do not provide Services directly to children under 18 or proactively collect their personal information. If you are under 18, please do not use the Website or offerings or share Personal Data with us. If you learn that anyone younger than 18 has unlawfully provided us Personal Data, please contact us at dpo@euronetworldwide.com.

8. Data Security

We are committed to protecting your Personal Data and have put in place commercially reasonable and appropriate safeguards to prevent any loss, abuse, and alteration of the information you have entrusted us. At eSimChoice we will always strive to ensure your Personal Data is well protected, in accordance with international best practices. We maintain this commitment to data security by implementing appropriate physical, electronic and managerial measures to safeguard and secure your personal information.

To safeguard our systems from illegal access we use secure, cutting-edge physical and organizational security measures which are continuously enhanced to ensure the highest level of security in accordance with international best practices and cost efficiency. All Personal Data is kept in a secure location protected by firewalls and other sophisticated security mechanisms with limited administrative access.

Personnel who have access to your Personal Data as well as the processing activities surrounding your Personal Data are contractually bound to keep your data private and adhere to the Privacy Policy we have implemented in our organization.

9. Marketing and Advertising

We may contact you from time to time (by email, SMS text, letter, or phone as necessary and according to your specific instructions) and when you have provided us with your consent to provide targeted marketing about our Services and/or our products.

Why would you receive electronic communications?

Depending on the country you are based in, you will receive marketing communications if you have authorized us to process your Personal Data for those purposes. That means you have opted-in during the registration process or at any time in the settings section of your profile.

We may also send you electronic communications for marketing purposes when you have a contractual obligation with us, meaning when you are currently using our Services or when you haven't expressly requested to not receive said marketing communications.

You will always be informed and we will make sure that during the usage of our Services or even during the registration process, you have all the necessary information in order for you to be aware that your Personal Data may be used for that specific purpose and you will, during the registration process or during the usage of our Services be given the opportunity to expressly say that you are not interested in receiving such marketing communications. In these instances, we will remove you from our list and you will not receive any updates that may be of your interest regarding our Services and products. You will be able to opt-back in at any time.

How can you opt-out?

You will be able to withdraw your consent at any time by using one of the following mechanisms:

- Use the opt-out link you will receive in any of our communications.
- By sending an email at dpo@euronetworldwide.com.

If you have any additional questions regarding the usage of your Personal Data for marketing purposes and/or wish to start receiving marketing communications, you can also send an email to dpo@euronetworldwide.com.

10. Description of Personal Data Rights

Depending on where you live, your Personal Data Rights under applicable law may include:

1. **Right to Know:** the right to know what Personal Data is being collected, sold or shared and to whom.
2. **Right to Access:** the right to request access to a copy of your Personal Data.
3. **Right to Correct Inaccuracies:** the right to request correction of inaccuracies in your Personal Data.
4. **Right to Deletion:** the right to request deletion of your Personal Data where certain conditions apply.
5. **Opt-Out Rights:**
 - a. The right to opt-out of the processing of Personal Data for the purposes of targeted advertising.
 - b. The right to opt-out of the processing of Sensitive Personal Data.
 - c. The right to opt out of the processing of personal data for profiling in furtherance of decisions that produce legal or similarly significant effects concerning the Data Subject.
6. The right to limit sensitive personal data use and disclosures to specifically permitted purposes.
7. **Right to Restrict Processing:** the right to restrict processing where certain conditions apply.
8. **Right to Data Portability:** the right to receive Personal Data in a structured, commonly used and machine-readable format and have the right to transmit the Personal Data to another controller under certain conditions.
9. **Right to Object:** the right to object to the processing of Personal Data (i.e., for direct marketing purposes).
10. **Rights related to Automated Individual Decision-Making:** the right not to be subjected to a decision based solely on automated processing, including profiling, which produces legal or similarly significant effects on the individual.
11. **Right of No Retaliation:** a business shall not discriminate against an individual for exercising their Personal Data rights.

We will respond to your request as soon as possible and within the timeframe stated in the applicable law.

To exercise any of your rights, you must send an email to dpo@euronetworldwide.com. To help protect your privacy and maintain security we will take necessary steps to verify your identity and may ask you to provide other details before granting you access to your Personal Data or initiating a modification of any Personal Data. When required, if we don't have a copy of your ID or any legal valid document that proves your identity, we will not be able to answer your request.

Be aware that some rights may not be enforceable due to business necessities or legal obligations while providing you with the Service. Your rights may be limited in order to comply with other legal obligations such as anti-money laundering, contractual and

compliance obligations. Notwithstanding that you will always be responded to when exercising any of the rights stated above and/or any additional right you may have depending on your jurisdiction. If your right can't be enforced, you will always receive a proper explanation.