

This Privacy Policy applies to the Website of Euronete, a WireCo® WorldGroup brand, located at <http://www.euronete.com> (the "Site"). Euronete or WireCo® WorldGroup may be referred to as "our," "us," or "we." We may refer to you as "you" or "user." Your privacy is important to us and we are committed to protecting the personally identifiable information ("Personal Information") that you disclose to us. Personal Information includes your name, mailing address, phone number, e-mail address, and other such information. This Privacy Policy explains how we collect Personal Information and other types of information ("Non-Personal Information") from users of our Site, how we use the Personal Information and Non-Personal Information we collect, and how we protect your Personal Information.

This Privacy Policy is subject to change without prior notice. For that reason, we encourage you to review this Privacy Policy periodically and to make note of the date of the most recent revision. If you disagree with the manner in which we intend to use the Personal Information you provide to us, you may opt-out of these uses by following the instructions below. By using our Site, you agree to the terms of the Privacy Policy in effect at that time.

## **Information We Collect**

We collect Personal Information through this Site in order to respond to customer inquiries and to help us develop products that meet our customers' needs. We also collect Non-Personal Information as described below. You are not obligated to provide us with Personal Information in order to use the Site.

## **Collection of Non-Personal Information**

"Cookies" are pieces of Non-Personal Information that are placed on an individual's computer hard drive to enable the individual to more easily communicate and interact with our Web site. Using cookie technology, we track your click path through our Site. Though this Non-Personal Information does not identify you, we may use it to help customize your visit to our Site. We may also use cookies to record how many times a user has visited our Site and what pages the user has accessed. You may, however, disallow receiving cookies at any time through your Web browser. It is not our intention to use cookies to retrieve information that is unrelated to our Site or your interaction with our Site.

## **Collection of Personal Information**

Our Site is designed allow users to contact us directly with comments, requests, and inquiries regarding our products and services. We may collect Personal Information in a number of ways. Our "Contact Us" page lists fax, phone, e-mail and online inquiry options. If you choose to utilize the online inquiry form, you will be asked to submit Personal Information to us. We also post employment opportunities on our "Jobs/Careers" page and accept submission of resumes and job applications via e-mail links from our Site. In addition, we offer our users the opportunity to receive our free e-newsletter by submitting their names, e-mail addresses and other necessary Personal Information. We collect Personal Information from users who choose to send us inquiries through use of any of the options described above.

The follow sets out the legal basis for our processing of your personal Information: when you register for an account or interact with our Site or services, such processing is necessary for the performance of our services; when you respond to or enquire about an employment opportunity, such processing is necessary for the performance of our services; when you communicate with us or sign up for promotional materials or accept cookies, we process such data on the basis of our legitimate interest, and our legitimate interest is to provide you with our marketing communications; where we are required under applicable local law to obtain your consent for sending you marketing information, the legal basis is your consent; when we process or share personal data in the event of a sale, we process such data for our legitimate interest in providing our services; when we investigate suspected illegal or wrongful activity, we process such data on the basis of our legitimate interest and our legitimate interest is to ensure compliance with legal requirements and law enforcement requests and for public safety purposes.

## **Information of Children**

We do not knowingly collect any Personal Information from any users under the age of 13 or from users between the ages of 13 and 18. Due to the serious nature of our Site, and the lack of games or other child friendly pages, we have no reason to believe that any children under the age of 18 would be attracted to our Site or have reason to submit any Personal Information to us.

## **Use of Personal Information**

We use Personal Information in order to learn more about our customers, to measure usage patterns on the Site, to enable us to respond to our customer's questions and requests, and to help us in developing products and services to meet our customer's needs. If you submit your Personal Information to us it may be retained in our internal database system for data collection, business research and record keeping purposes. In addition, we will e-mail our e-newsletter to users who have requested it and who have provided us with working e-mail addresses and any other reasonable Personal Information we require. Any user who wishes to cancel receipt of the e-newsletter may do so by following the instructions in the Opt-Out section below. Additional use of your Personal Information that is not described in this Privacy Policy will only take place as required by statute or when we have obtained your consent.

## **Sharing of Personal Information**

We will not provide or sell any Personal Information to marketing research or bulk advertising sales companies. However, we may forward your product requests and inquiries to one of our product distributors in order to enable you

to purchase products directly from such distributor and to ensure that your requests are met in the most timely and efficient manner.

The GDPR and national laws of European Union member states implementing the Regulation permit the sharing of Personal Information with third parties only under certain circumstances. We will only share your Personal Information as described in our Privacy Policy under the heading "Sharing of Personal Information" if we are permitted to do so under applicable European and national data protection laws and regulations.

**Retention Period**

We retain Personal Information for as long as needed or permitted in light of the purpose(s) for which it was obtained and consistent with applicable law.

**Links to Third-Party Web sites**

We may include on our Site one or more links to Web sites owned and controlled by third-parties, such as our distributors and customers. We provide these links as a convenient means of accessing information that may be useful or of interest to you. Please note, however, that when you click on a link to a third party's Web site, you will not be alerted that you are leaving our Site. This Privacy Policy and the practices that we follow under this Privacy Policy do not apply to the Web sites of any third parties. Third party Web sites are operated independently from our Site. We are not responsible for, nor do we have any control over, the products, services, content, accuracy, or opinions expressed on any third party Web site or for the privacy practices or security standards used by third parties on their respective Web sites. We will not, and are under no obligation to investigate, monitor or check any third party Web sites to which we link for accuracy or completeness, or for any incorrect, inflammatory, slanderous, defamatory, infringing, or unlawful content of materials. Nor are we under any obligation to investigate or monitor how third party Web sites collect, use, or secure any Personal Information you provide to them. You understand and agree that by clicking on a link to a third party's Web site, you have left this Site, and the terms stated in this Privacy Policy are no longer in effect.

**Opt-Out**

You may choose to have your name taken off of our e-newsletter list, to review and/or update the information that you have provided to us, or to request the removal of your Personal Information from our database by calling or sending a fax to us at the phone numbers listed on the "Contact Us" page of our Site, or by sending us an e-mail by clicking on the "information request" link on our "Contact Us" page.

**Security**

We are committed to ensuring that your information is secure. In order to prevent unauthorized access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect online. However, due to the open communication nature of the Internet, we cannot guarantee that communications between you and us, and us and you will be free from unauthorized access by third parties.

**Your Acceptance of this Policy**

By using this Site, you signify your acceptance of our Privacy Policy. If you do not agree to this Privacy Policy, please do not use our Site. We reserve the right, at our discretion, to change, modify, add, or remove portions from this Privacy Policy at any time so visitors are encouraged to review this policy from time to time. Your continued use of our Site following the posting of changes to these terms means you accept these changes.

**How to exercise your rights**

We take steps to keep your Personal Information accurate and up to date. If you reside in the European Economic Area, you have certain rights to the Personal Information that we have collected about you. To exercise your rights to your Information, please contact us by calling or sending a fax to us at the phone numbers listed on the "Contact Us" page. Subject to applicable law and in exceptional circumstances only, we may charge for this service and we will respond to reasonable requests as soon as practicable, and in any event, within the time limits prescribed by law.

You have the following rights:

- ♣ Right of access to your Personal Information
- ♣ Right to correction
- ♣ Right to erasure
- ♣ Right to restriction of processing
- ♣ Right to data portability
- ♣ Right to object

**Transfers from the European Economic Area**

By using the Site you understand that your Personal Information will be transferred to countries outside of your country of residence, including the United States, which may have data protection rules that are different from those of your country. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities in those other countries may be entitled to access your Personal Information. Some of the non-EEA countries are recognized by the European Commission as providing an adequate level of data protection according to EEA standards

(the full list of these countries is available here). For transfers from the EEA to countries not considered adequate by the European Commission, we have put in place adequate measures to protect your Personal Information. You may obtain further information of these on request by using the "Contact Us".

### **GDPR - Right to lodge a complaint before the Data Protection Authority**

We encourage you to contact us directly and allow us to work with you to address your concerns. Nevertheless, where the GDPR applies you have the right to lodge a complaint with a competent data protection supervisory authority, in particular in the EU Member State where you reside, work or the place of the alleged infringement. You have the right to do so if you consider that the processing of Personal Information relating to you infringes applicable data protection laws.

### **Contact Us**

If you have any questions about this Privacy Policy, please contact us by calling or sending a fax to us at the phone numbers listed on the "Contact Us" page of our Site, or by sending us an e-mail by clicking on the "information request" link on our "Contact Us" page.

### **Governing Law**

This Privacy Policy is governed by and interpreted in accordance with the laws of Portugal, without giving effect to the choice or conflicts of law provisions thereof.