



PAYU PRIVACY POLICY

This privacy policy describes:

- The personal information we collect and why.
- How we use your personal information.
- Your right to access, review, edit and delete your personal information, or deny PayU the right to use it.

We have tried to make this Privacy Policy as simple as possible, for your better understanding, as your privacy is very important to us.

Whether you have just registered as a PayU user, or have been using our services for a while, we invite you to get acquainted with this Policy.

1. WHAT TYPE OF INFORMATION DO WE COLLECT?

1.1. PayU collects the following information:

- **Information you provide to us.** PayU may ask you to provide personal information when you open a PayU account, in any of our countries of operation, or when you register to pay a Merchant (that works with PayU) for a product and/or service that you received. For example, we may request personal information related to your ID (name, email address, etc.).
- **Information we collect through our services.** We collect information linked to our services. The information we collect includes the following: IP address and cookies that will enable browser and PayU account identification.
- **Information we obtain from third parties such as credit bureaus and identity verification services**

1.2. "Personal information" is any information that identifies and is associated with a specific person, including contact data such as: name, address, phone, bank account number, and other similar information. This information belongs exclusively to the individual. Data entered that does not reflect or refer to a specific person, but may be personally identifiable information, such as: data on transactions, specific product or service procurement, payment and banking methods, among others, is not deemed "personal information".

1.3. For purposes described in this Privacy Policy, PayU may collect, use, store and protect the following types of personal information:



(a) ID information (i.e., name, address, land and mobile phone, email address, user name provided by PayU, among others.)

(b) Bank and payment information (such as credit card information, account number).

1.4. We may share your personal information among PayU Companies and / or our vendors in order to provide our services. PayU Companies and / or our vendors shall only use your personal information for the reasons described in this Privacy Policy. By accepting this Privacy Policy, you authorize us to share your personal information with PayU Companies and / or with our vendors.

1.5. This may also be combined with other information to provide and improve PayU Services, their content, and relevant publicity among others.

1.6. You are not required to provide your personal information, but, if you chose not to do so we will not be able to provide you with our services or respond to any queries or needs you may have.

1.7. You agree to this Privacy Policy by clicking on the “PayU Service Terms & Conditions” acceptance box on PayU websites. When your consent cannot be achieved through these means, the Merchant you purchase products or services from will be in charge of informing you about our Privacy Policy and will be the one to collect your acceptance thereof. You will always have access to this Privacy Policy through the link on our website www.payu.com.

1.8. PayU will not use your personal information for any other purposes than those described in this policy.

1.9. Please note that PayU Companies or other PayU vendors may treat your information in other countries in order to provide PayU Services. PayU will make sure that these countries have personal information protection levels according to this policy and to the applicable legislation.

1.10. All personal information and data you provide as a PayU user shall be reliable, accurate, complete, updated, clear and comprehensible.

1.11. We may amend this Privacy Policy at any time by posting a revised version on our website. The revised version will be effective at the time we post it, unless otherwise specified. If these amendments require your consent, you will be notified in order to express acceptance thereof. PayU recommends reading this policy thoroughly every time you use our Services.

2. HOW AND WHY WE USE YOUR PERSONAL INFORMATION?



2.1. Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience.

2.2. PayU collects your personal information, or appoints service providers who collect and use this information on PayU's behalf (according to this Privacy Policy), as allowed or required to:

2.2.1. Process transactions and send notices about your transactions to PayU Merchants and financial institutions that validate transactions and payers. In order to process transactions, we may validate and share your personal information with third parties, such as issuing financial institutions, procurement franchises like Visa and MasterCard, among others. By accepting this Privacy Policy, you authorize us to share your personal information with these institutions.

2.2.2. Screen your information through internal filters or those provided by third parties to PayU, in order to validate transactions and prevent identity theft for cardholders.

2.2.3. Troubleshoot and offer customer support.

2.2.4. Prevent prohibited or illegal activities, and enforce our General Terms and Conditions.

2.2.5. Customize, measure and improve our services, websites and PayU service access.

2.2.6. Compare information for accuracy.

2.2.7. Send notices on service issues and updates.

2.2.8. Verify your identity.

2.2.9. Contact you and send notices, if necessary. PayU respects your preferences regarding communication and contact method. If you do not wish to receive notices through text messages on your device, or if you prefer receiving them through a single means of communication, such as email, please let us know by communicating with us directly.

2.2.10. Resolve Disputes.

2.2.11. Invoice PayU Services.



2.2.12. Use your personal information for internal purposes such as audits, data analysis and research, to improve our products, services and communications for PayU users.

2.2.13. Handle your personal information on PayU servers located in different countries, always ensuring that these countries have the same data protection means as those established in this policy and in the applicable legislation.

PayU reserves the right to transfer your personal information beyond your country of residence, always ensuring that these countries employ the same data protection means as those established in this Privacy Policy and in the applicable legislation. PayU will only transfer this information in the limited circumstances of our Service and for the purposes described in this policy. By using PayU Services, you authorize us to transfer this information.

2.2.14. Store your personal information for as long as is needed under trade laws and /or privacy and data protection laws of the countries where we provide our services.

2.2.15. Request your participation or opinion on online surveys.

2.2.16. Send you messages, marketing and advertising content from PayU Companies, merchants registered with PayU and third parties, including sales and deals on goods or services through PayU.

2.2.17. Plan and hold competitions, games, offers, promotional and/or marketing activities, and other events hosted by PayU and/or Merchants associated with PayU, or not.

2.2.18. Send you free gifts and coupons for future purchases through PayU.

2.2.19. Propose membership loyalty programs, create user consumer profiles and send you promotional and advertising content that may be of your interest.

2.3. PayU will request your consent before using your personal information, for any purpose other than that established under this policy.

2.4. PayU will collect your personal information in its relevant database or personal databanks, and will properly handle such information as established in this policy. Databases or databanks will be registered before competent authorities, whenever the law requires us to do so.



3. MARKETING

3.1. PayU will not sell or profit from the use of your personal information in any way.

3.2. We may combine your personal information with our information, PayU Merchant information, PayU service users, or third parties, to improve and customize marketing and promotional content that may be of your interest.

3.3. If you do not wish to receive marketing communications from us or participate in our customization programs to improve your product and service profile, or those of merchants connected to PayU or third parties; you may request the removal of your personal information for these purposes, through the methods described in this policy or through the different methods we may use to contact you.

4. COOKIES AND SIMILAR TECHNOLOGIES

4.1. PayU websites, online services, email messages and ads may use "cookies" and other similar technologies, pixel tags and web bugs. We use these technologies to help us better understand user behavior, recognize which parts of our websites were visited and measure promotional effectiveness and web searches.

4.2. By using our services, you are aware that we use cookies on our websites and software.

4.3. You are free to decline cookies at any time. However, declining our Cookies may interfere with your access to cookie-enabled features on our site.

4.4. Information collected by cookies and similar technologies will be treated as non-personal information, unless otherwise specified under the legislation of countries where PayU provides its services.

4.5. Internet Protocol Addresses (IP) and similar identifiers will be treated as personal information when so required by the legislation of countries where PayU provides its services.

4.6. When non-personal information is combined with personal information, it will be treated as personal information.

5. ACCESS PASSWORDS

5.1. PayU may enable a personal password that you can set up on your own and use to access PayU services through our website.



5.2. We will keep your password completely confidential and under no circumstances will we reveal it or share it with others.

5.3. You will be responsible for all actions arising from your use of email addresses and passwords to access PayU services.

6. HOW WE SHARE YOUR PERSONAL INFORMATION WITH OTHER PAYU USERS AND THIRD PARTIES TO PROVIDE OUR SERVICES.

6.1. PayU may share your personal information with financial entities, franchises, verification entities, or any other type of entity that is involved in payment processing and validation, for purposes established in this Privacy Policy. By accepting this Privacy Policy, you authorize us to share your personal information with other entities.

6.2. We may share your personal information with merchants registered with PayU, for PayU payment processing. This includes sharing information related to payment rejections or unsuccessful payments you may have attempted with these merchants. Unless you have agreed to it, Merchants registered with PayU are not allowed to use this information for purposes other than those described in this policy. PayU is not responsible for information practices of merchants registered with PayU, or their compliance with personal data protection laws.

6.3. We will not disclose your credit card number or bank account number to the merchant you have paid through PayU, unless you authorize us to do so.

6.4. In certain cases, and if necessary, we may share your personal information with companies from the PayU group, operators, agents or service providers that we partner or contract with; we will always demand the use of appropriate data protection measures (organizational, technical and the like) from those we share your personal information with, in order to protect your personal information and respect the applicable law.

6.5. PayU may share your personal information with credit bureaus and collection agencies, to the extent permitted by law.

6.6. PayU may share your information with companies that we plan to merge with or acquire partially or entirely. In every case, this Privacy Policy will continue to govern the use of information until it is replaced or revised, depending on the situation.

6.7. PayU may reveal your personal information when we need to do so to comply with law, or credit card rules and financial institution policies involved in payment validation and processing procedures.



6.8. PayU may reveal your personal information as part of a legal process, litigation and / or request from public and government authorities within and beyond your country of residence.

6.9. PayU may reveal your personal information if necessary, to comply with the law or with an administrative or legal order.

6.10. PayU may reveal your personal information when we believe that the disclosure of personal information is necessary to avoid damages or financial loss for PayU or any PayU service user.

6.11. PayU may disclose your personal information to report suspected illegal activity.

6.12. PayU may access and use your personal information when we believe in good faith that it serves the purpose of: i. meeting the applicable legislation; ii. protecting our users from unwanted mail and fraud, among others; iii. operating and maintaining our websites, products and services, such as to prevent or end an attack on our networks and IT systems; iv. protecting our rights and property; v. enforcing compliance with the terms that govern the use of our websites, products or services.

7. HOW YOU CAN ACCESS YOUR RIGHTS AND PERSONAL INFORMATION

7.1. PayU lets you review and edit your personal information or deny its treatment at any time. You will be entitled to access this information, as required or permitted by the laws of your country or of the country where this personal information is being treated, accordingly.

7.2. You may take all necessary measures involving your personal information as mentioned above, unless we have a duty to store your information in our system, for legitimate legal or corporate reasons.

7.3. PayU may reject change requests, revisions and updates on your personal information, as required or permitted by law, if they are i. more repetitive than reasonable, ii. require a disproportionate technical effort (such as developing a new system or radically changing an existing practice), iii. endanger the privacy of other users, or iv. are not at all practical (such as requests that refer to information stored in backup systems).

7.4. PayU may provide free data updating services. If updates or changes on personal information generate any cost, you will be notified previously and will be charged as permitted by law.



7.5. As you use our services, we protect your personal information from accidental or deliberate removal. Therefore, although you may eliminate your information from our services, PayU may not immediately destroy residual copies stored on our active servers, or information stored in our security systems, if removal thereof may cause any damages to the rights or interests of third parties, or if we have a legal duty to store such information.

8. LINKED WEBSITES AND THIRD PARTY APPLICATIONS

8.1. PayU websites may have links that take you to other sites.

8.2. Linked websites are not under PayU's control and may have different privacy policies.

8.3. If you use add-ons or third party applications to access our services, some of your personal information may be shared with the owner of these applications. PayU cannot control how the owner of the application uses the personal information it receives. You are encouraged to review the privacy policies of these third parties before installing or using their apps.

8.4. PayU's Privacy Policy only refers to personal information that we've requested. Always use caution when providing personal information online. We take no responsibility for websites beyond our control.

9. HOW WE PROTECT PERSONAL INFORMATION

9.1. PayU uses all legal, technical, and administrative security measures deemed necessary to keep your personal information secure, in compliance with the relevant obligations and exceptions under the legal regulations in force.

9.2. PayU follows industry standards on personal information, including, among others, firewalls, Virtual Private Networks and Secure Socket Layers. We are also certified under the PCI (Payment Card Industry) Data Security Standard.

9.3. PayU protects your personal information as we use and store it. Information will be encrypted when needed, among other existing or future techniques that guarantee information security.

9.4. PayU reviews its policy in terms of collection, storage and treatment of personal information, including physical safety measures to prevent adulteration, loss, unauthorized consultation, use or access to your personal information.



9.5. PayU communicates its Privacy Policy to employees and providers and applies strict internal privacy protection measures.

9.6. PayU limits personal information access to contractors, agents and employees that process such information. Access to personal information is only enabled for our employees, along with authorized employees of our affiliates, subsidiaries or service providers, on a need-to-know basis. We ensure their compliance with non-disclosure obligations under contract and the legal consequences that this breach may imply.

9.7. PayU ensure that those involved in treating your personal information meet confidentiality obligations under contract, and that these obligations prevail even after our relationship with these people has ended.

10. RETAINING PERSONAL INFORMATION

10.1. PayU will keep your personal information for the time required to meet the purposes described in this Privacy Policy, unless a longer retaining period is required or permitted by law.

11. CHILDREN

11.1. We do not knowingly collect, use or disclose personal information from children under the age of majority established by each jurisdiction, without prior consent from their parents or legal guardians.

11.2. Our services are not designed or intended for children.

11.3. If we realize that a child's personal information has been collected (under the age of majority established by his / her jurisdiction) without first receiving verifiable consent by his / her parents, we will delete this information as soon as possible.

11.4. We suggest that parents remain informed around their child's online activity to guarantee that a child's information is not collected without his / her parent's authorization.

12. PRIVACY QUESTIONS

12.1. If you have any questions or concerns about our data processing or Privacy Policy, or if you wish to submit a claim on a possible violation of local privacy laws, please contact us at: sac@payulatam.com.

12.2. Personal information updates by users, as well as rights to information, access, changes, cancellation or disagreements may be sent to sac@payulatam.com.



12.3. We will answer your requests as soon as possible. If you are dissatisfied with our answer, you may send your claim to the competent data protection authority.