

DATA PRIVACY POLICY

Reference:

*Republic Act No. 10173, otherwise known as **Data Privacy Act of 2012***

This Privacy Policy discloses the privacy practices for cashcart.io, which is owned and operated by CASHCART INFINITY SHOPPING CORPORATION, PHILIPPINES, as well as the use of any application created by CashCart. This Privacy Policy applies to our collection and use of information from all visitors to the site, including, without limitation, visitors using only free services offered on the site.

You are solely responsible for maintaining the confidentiality and security of the usernames and passwords for your accounts, and you assume all liability for sharing or disclosing your username and password. You must not share credentials with anyone else, and you authorize CashCart to act upon instructions and information from any person that enters your credentials. You agree to immediately contact the applicable enterprise if you become aware that the security of the username and password for your account with such enterprise may have been compromised or if there has been unauthorized access to the username and password for your account with such enterprise. You are solely responsible for all activity occurring under the username and password for your account with the Companies who use the Service. Access to and use of password-protected and/or secure areas of the Site and the Service is restricted to authorized users only. Any information collected from or about you through your use of the Site or Service is subject to the Cashcart.io Privacy Policy.

DATA SHARING

How data is shared a within a transaction peer within the CashCart ecosystem:

Buyer

Upon check-out, the buyer is notified that his/her basic personal information will be shared to his/her transaction peer: the merchant, who confirms his/her order; and the Pick-O deliverer once pick up of order is initiated by the Pick-O system;

Merchant

Seller is notified that his/her basic information will be shared to the buyer once he/she confirms the order from the buyer. When seller broadcasts an item for pick-up through the Pick-o system, the seller is also notified that his his/her basic information will be shared to the Pick-O deliverer.

C. Pick-O Deliverer

Upon accepting a pick-up order from the seller, the deliverer is notified that his/her basic information will be shared to the shopper and seller.

These three actors as transaction peers have to manually click the permission button.

Basic data to be shared among transaction peers within a particular transaction are the following:

Basic information from shopper and merchant

1. Complete name with accompanying real clear photo
2. Complete address (shipping address for the buyer)
3. Address landmark as shown in Google Map
4. Contact number (mobile phone)

From Pick-O Deliverer

1. Complete Name
2. A selfie or profile image showing clear photo of the person
3. Image of his vehicle showing plate number
4. Driver's license number
5. Contact number (mobile phone)

DATA DISPOSAL AFTER TRANSACTION

Data shared will automatically be hidden, withdrawn or disposed from the transaction records after a week without dispute except for the names of the transaction peers and the hash of the transaction pointing to the blockchain explorer.

In case a dispute arises in a transaction, all shared data stay present until the dispute is closed or resolved.

PERSONALLY IDENTIFIABLE INFORMATION

Throughout this Privacy Policy, we use the term "personally identifiable information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific user.

We collect personally identifiable information from you when you set up an account with Cashcart.io. You do not need to register an account in order to navigate the Site, but you must be registered to use any version of the Cashcart.io payment processing application via the Site.

The collection and use of data from a variety of sources is essential to our ability to provide our Services – and to help keep the Services safe. Data is critical in helping us to increase the safety of your online payments, and reduce the risk of fraud, money laundering and other harmful activity.

Except as otherwise set forth in this Privacy Policy, Cashcart.io does not sell, share, or in any other way transmit personally identifiable information (names, address, phone numbers, etc.) submitted by non-registered users to any other persons or companies.

We may use contact information from registered or non-registered users to send promotional products and information about Cashcart.io, the Site and/or on behalf of our partner companies.

We may provide personally identifiable information of registered users to third party service providers and referral partners that work on behalf of or with us to provide some of the aspects of our services and to help us communicate with you. However, these service providers and referral partners do not have any independent rights to disclose this information (except to the same extent we would have a right to disclose that information under this Privacy Policy).

If you submit any personally identifiable information relating to other people to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

If our company or our assets are acquired by another company, that company will possess the personally identifiable information collected by us.

NON-CUSTOMER SALES, SERVICE OR INFORMATION INQUIRIES

When you submit an online "contact us" or other online inquiry form or when you call, write, fax or otherwise initiate contact with CashCart, we record your contact information (name, address, phone number, and email address) in our CRM (Customer Relationship Management) system. This information is used for answering your questions as well as ongoing marketing communication programs. In some cases, you may be referred to a CashCart

online inquiry form via a link on a third party referral website. In that case, any information collected on the cashcart.io hosted online inquiry form may be shared with the referring party only, and that referring party may use it for their own, non-cashcart.io related, marketing communication programs. CashCart protects all information collected via online inquiry forms and will not disclose it to any third party except as otherwise set forth in this Privacy Policy.

You consent to receive auto-dialed calls from or on behalf of CashCart at any number provided to CashCart, whether such number is directed at a residence, a business, a wireless telephone, or otherwise. You understand that this consent is not a condition of purchasing the products and services offered by CashCart.

To obtain a CashCart account you must provide your contact information (name, address, phone number, and e-mail address) in addition to other personally identifiable information, including but not limited to, your social security number (we may use the last 4 digits provided to obtain and store the full social security number), driver's license and number, Employer Identification Number (Tax ID), and billing information.

We use your personally identifiable information to verify your identity, perform a credit check, and send you messages about your transactions or our company. We use your billing and financial information (bank account numbers) to facilitate payments through the CashCart system and collect fees if applicable.

HOW WE SHARE PERSONALLY IDENTIFIABLE INFORMATION WITH THIRD PARTIES

Personally identifiable information we collect is shared with service providers under contract who help with parts of our business operations including but not limited to identity verification, credit checks, fraud prevention, bill collection, payment processing, marketing, and technology services. Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit, except as otherwise set forth in this Privacy Policy, including without limitation as set forth in the Non-Customer Sales, Service, or Information Inquiries section above. We will make reasonable commercial efforts to ensure that they comply with such policy or requirements, however, we will have no liability to you if any person fails to do so.

We may use third-party analytics providers, such as Google Analytics, which use cookies and similar technologies to collect and analyze information about use of the Services and report on activities and trends. These third parties may also collect information regarding the use of other websites, apps and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners/, and opt out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

USE OF DEMOGRAPHIC AND PROFILE DATA

In our efforts to continually improve our product and service offerings, we collect and analyze demographic and profile data about our users and their customers. This includes, but is not limited to, activity from merchants utilizing CashCart Paid Account Solutions, Apps, and the CashCart free account as well as our merchants' customers who make payments online or via mobile devices. We identify and use your IP address to help diagnose problems with our servers, and to administer the Site. Your IP address, along with cookies, is used to help identify you and gather basic information and help personalize your online experience with us. A cookie is a small text file that is stored on your computer to help us make your visit more user-friendly by improving the site and your experience with it. Any data collected through cookies will be treated in accordance with this Privacy Policy. If you have set your browser to warn you before accepting cookies, you should receive a warning message with each cookie. You may refuse cookie by turning them off in your browser, however, you should be aware that our site may not work well with cookies disabled. We use personal data to: (i) provide the Services; (ii) detect and prevent fraud; (iii) mitigate financial loss or other harm to Users, Customers, and CashCart; and (iv) promote, analyze and improve our products, systems, and tools.

Examples of how we may use personal data include: (i) verifying an identity for compliance purposes; (ii) evaluating an application to use our Services; (iii) conducting manual or systematic monitoring for fraud and other harmful activity; (iv) responding to inquiries, sending service notices and providing customer support; (v) processing a payment, communicating regarding a payment, and providing related customer service; (vi) for audits, regulatory purposes, and compliance with industry standards; (vii) developing new products; (viii) sending marketing communications; (ix) improving or modifying our Services; and (x) conducting aggregate analysis and developing business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of, our business.

We also reserve the right to use aggregated anonymized data provided that those data do not relate to any individual.

We use and disclose personally identifiable information as we believe necessary: (i) under applicable law, or payment method rules; (ii) to enforce our terms and conditions; (iii) to protect your rights, privacy, safety or property; and (iv) to respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities, which may include authorities outside your country of residence.

We will occasionally ask you to complete optional online surveys. These surveys may ask you for contact information and demographic information (like zip code, age or income level). We may use this data to tailor your experience on the Site, providing you with content that we think you might be interested in—and to display content according to your preferences. We sometimes use contact data from our surveys to send you information about our company and/or promotional material on behalf of our partners. We never use personally identifiable information about your customers to contact them directly, nor do we share this data with any third parties.

For quality and training purposes, CashCart may monitor or record its telephone conversations with you or anyone acting on your behalf. By communicating with CashCart, you acknowledge that your communication may be overheard, monitored, or recorded without further notice or warning.

In order to help protect you from fraud and misuse of your personal information, we may collect information about you and your interactions with CashCart. We may also evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

We may create anonymous records from personally identifiable information by excluding information (such as your name) that makes the information personally identifiable to you or one of your customers. We may use this anonymous information to direct future development, including but not limited to analyzing usage patterns so that we may enhance our services, and providing reports based on anonymous non-personally identifiable information. We reserve the right to use and disclose anonymous information to third parties, at our discretion.

DATA RETENTION POLICY AND MANAGING YOUR INFORMATION

We will retain personally identifiable information for as long as you remain an active CashCart user and for a reasonable time thereafter. We may retain anonymized and aggregate data indefinitely.

We have a variety of obligations to retain the data that you provide to us, including to ensure that transactions can be appropriately processed, settled, refunded or charged-back, to help identify fraud and to comply with anti-money laundering and other laws and rules that apply to us and to our financial service providers. There may also be residual data that will remain within our databases and other records, which will not be removed.

SECURITY

CashCart has security measures in place to protect against the loss, misuse and alteration of the information under our control, as described in our security page. We protect personal data with appropriate physical, technological and organizational safeguards and security measures.

Your personal data comes to us via the Internet which chooses its own routes and means whereby information is conveyed from location to location. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. As such we cannot give any warranty or assurance that the means where information is conveyed to us are safe, reliable or have integrity. Our site has security measures in place to protect against the loss, misuse and unauthorized alteration of the information under our control. More specifically, our server uses SSL (Secure Sockets Layer) security protection by encrypting your Personal Data including credit card number, name and address to prevent individuals from reading these Data as it travels over the Internet. The length of time we retain personal data outside our backup system varies depending on the purpose for which it was collected and used. This period may extend beyond the end of the particular relationship with us but only for so long as we are contractually bound to do so, or so far as is necessary for audit or other accounting purposes. When personal data are no longer needed we have procedures either to destroy, delete, erase or convert it to an anonymous form.

OTHER DISCLOSURE OF INFORMATION

We may disclose your personally identifiable information to law enforcement, government officials, or other third parties when:

We are compelled to do so by a subpoena, court order or similar legal procedure;

We need to do so to comply with law or credit card rules;

We believe in good faith that the disclosure of personally identifiable information is necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of our terms of use.

You request or provide specific permission to share such information.

CROSS-BORDER TRANSFER

CashCart's services are global and data (including personally identifiable information) may be stored and processed in any country where we have operations or where we engage service providers, and we may transfer data 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. However, we will take measures to ensure that any such transfers comply with applicable data protection laws and that your data remains protected to the standards described in this privacy policy. In certain circumstances, courts, law enforcement agencies, regulatory agencies or security authorities

in those other countries may be entitled to access your personal data. If your information is transferred to other countries, including countries which may not have data protection laws that provide the same level of protection that exists in your country, we will protect the information as described in this Privacy Policy.

SENSITIVE DATA

Because email communications are not always secure, please do not include credit card or other sensitive data (such as racial or ethnic origin, political opinions, religion, health, or the like) in your emails to us.

CHOICE/OPT-OUT:

You may opt-out of receiving marketing communications from us and our partners by following the opt-out instructions we include in such communications.

You may request that your personal information be removed from all CashCart systems. This request must be made in writing to the address provided below. Note that if you request removal of your personal information you will no longer have access to any existing CashCart account and will not be able to use any CashCart product or service.

ACCEPTANCE

By using this site, you signify your agreement and express consent to this Policy. CashCart reserves the right to change this Policy at any time. Any changes will be posted so that you are always aware of what information we collect, how we use it and under what circumstances we disclose it.

EFFECTIVE: 28 October 2018

COMPANY ADDRESS: CashCart Infinity Shopping Corporation, 15D/15R Future Point Plaza III, Panay Ave., South Triangle, Diliman, Quezon City, Philippines 1103