



Sentenor Bank Corporation Privacy Policy

Sentenor Bank Corporation takes the privacy of its site visitors, users, and customers very seriously and as such ensures that their personal information and confidential information are securely stored.

This notice applies to the legal entities that provides Sentenor Bank services under Sentenor Bank Corporation name.

This Privacy Policy aims to assist you in understanding what data we collect, why it is collected, and what Sentenor Bank Corporation does with your data.

The information collected is utilised to understand our customer's behaviour and eligibility for Sentenor Bank Corporation's products and services, allowing us to provide a better service to our customers.

From the moment you access Sentenor Bank Corporation, you agree to this Privacy Policy. It is your responsibility to read, understand, and agree to the terms set out in this document and consent to the use of your data as described. For any questions or concerns regarding this Privacy Policy, contact our compliance department via e-mail at pokeefe@sentenorbank.com

Please be aware that whilst this Privacy Policy sets out our approach to the storage, management and processing of your personal data, you may have different rights under the data protection legislation which applies to you (for UK customers Data Protection Act 2018 and for EEA customers the General Data Protection Regulation (EU) 2016/679 (GDPR) and any other legislation applicable to Sentenor Bank Corporation's services in the relevant jurisdiction).

1. Information We Collect from You

We collect your personal information and Confidential Information to provide you with better and more useful services. When you register for your Sentenor Bank Corporation Account, you provide us with personal information, including but not limited to, your name, email, date of birth, credit/debit card and bank account information.

1.1. Registration Information

We collect information when you create your Sentenor Bank Corporation account. Depending on how you want to use your account we may ask you to provide some or all the following: Credit or Debit card number, bank account number, relevant expiration dates, phone number, date of birth, ID documents, photos of ID, Photo of the individual registering, video recording of the individual of registering, phone number, industry type, purpose of your Account, transaction information. Same documents may be asked from the individual representative of

the registering legal entity. We may also request additional information as part of our ongoing verification and monitoring processes and controls.

1.2. Additional Information

We may request additional details or to answer further questions to verify your information. We may also obtain additional information about you from third parties, including third party partners and service providers. This information includes information about your behaviour, bank accounts or payment methods issued by third party financial institutions that are linked to your Sentenor Bank Corporation's products. We also collect information about which tabs you visited on our site, your browser information, your location, and your frequency of use of our site.

1.3. Transaction Information

Information about your transactions is collected and reviewed including but not limited to:

- Date, time, amount, devices associated with the transaction.
- IP address of sender and receiver.
- Sender's name and registration information.
- Receiver's name and registration information.
- Messages sent or received with the payment.
- Device information used to facilitate the payment and the payment instrument used.

1.4. Merchant Information and Confidentiality

We gather, use, and may disclose data on our merchant accounts. When a merchant registers for Sentenor Bank Corporation Account, they are required to provide information about their business to perform relevant credit and risk assessments. This includes collecting information about merchant's key controllers, the directors, partners, and shareholders and confidential information.

Sentenor Bank Corporation shall use your confidential information only for the purposes of the evaluation set out in the Terms and Conditions and Privacy Policy and not for any other commercial or operational purpose, nor in connection with any similar project undertaken by it, nor in any manner detrimental to the You, its affiliates, or their respective representatives.

In addition to these specific obligations, Sentenor Bank Corporation shall protect and safeguard your confidential information with at least the same degree of care with which it protects and safeguards its own confidential information.

By accepting the Terms and Conditions and Privacy Policy, you also agree that you shall not use or disclose Sentenor Bank Corporation's confidential information other than the way Sentenor Bank Corporation uses or discloses Your confidential information. This information is used to verify our merchants and their key controllers. This includes verifying certain data provided by our merchants and reviewing their eligibility to use our product and services. Third party partners and service providers may be used to validate the information provided by you

at account registration. Sentenor Bank Corporation reserves the right to periodically review merchant accounts. This may involve the request of a credit reference from a credit or fraud agency on any merchant account. As part of this review Sentenor Bank Corporation reserves the right to close, freeze or limit use of an account based on the information found.

For different merchant accounts, we may collect information about a merchant's business and online profile to review a merchant's size, customer base, and expected transactional activity.

1.5. Maintaining Updated Information

In addition to the information provided upon registration of your account, we also collect information we receive from you as a result of your use of our services. This allows us to verify your identity periodically and analyse your behaviour to provide you with better customer service. The information collected includes but is not limited to: Log-in details, location information, device information, transaction information, third party information, identity information and cookies.

2. Usage of Personal Information and Duration

Registration information is used to verify your identity. This includes verifying certain data provided by you and reviewing your eligibility to use our products and services.

We use information we collect about you to provide you with the products we offer, to notify you about changes to our products and to improve our products.

Transactional information is kept for ensuring our service levels and for regulatory requirements. This includes checks in relation with the Anti-Money Laundering, Know Your Client, Know Your Transaction, Politically Exposed Persons policies and any other checks that Sentenor Bank Corporation is obliged to conduct based on venue and category of the services provided. Unless otherwise stipulated in this Privacy Policy or there's a regulatory or legal requirement exists, Sentenor Bank Corporation will delete Your personal information when Your relationship with Sentenor Bank Corporation ceases.

2.1. Internal Use

We reserve the right to obtain and use your personal information and confidential information. By browsing our site, you give us your explicit or implied consent to collect, retain, and use your information. The below defines some examples in which we may use your information to:

- Develop a more user-friendly site with tailored use.
- Provide you with tailored information regarding our products and services.
- Analyse customer support as to improve our services.
- Offer you special features and promotions based on your requirements.
- Ensure your continued eligibility for our products and services.

This information is only shared with our internal stakeholders on a need-to-know basis with strict data security regulations which we abide by.

2.2. Third Party Use

We may share your personal information or Confidential Information with trusted third parties and service providers to improve our services, as permitted by data legislation or in the limited circumstances as set out below. These third parties are limited by law or by contract from using the information for secondary purposes beyond the purposes for which the information is shared.

We may share your information with trusted third parties when:

- Providing you with special features (services) upon your request (including E-Banking).
- Responding to a subpoena, warrant, court order, or as otherwise required to by law.
- Conducting or co-operating in investigations of fraud or other illegal activity where we believe it is reasonable and appropriate to do so.
- Interacting with our approved business service partners who are held to contractual and legal regulations as to how they are permitted to handle your data.
- Gathering your IP address, browser type, access times to improve our site.
- In the case of a merger with another company or any rebranding would mean that the new company or brand would have access to the personal information provided by you.

The current Privacy Policy would apply, unless amended or otherwise stated.

3. Information Disclosure

You consent to our collection, use and disclosure of the personal information and Confidential Information you provided, as outlined below.

We may disclose your information:

- To other members within the group structure in which Sentenor Bank Corporation is established for the purposes described in this Privacy Policy including cross borders outside of the EEA, wherever members of the group are located. In the event of a cross border transfer of data, Sentenor Bank Corporation is committed to provide appropriate protection for your information and meet the highest standards of data protection required.
- To trusted third-party partners to validate the information you provided upon registration of your account.
- We may also provide other relevant data that is necessary to confirm your eligibility for the use of specific products and services provided by us.
- To third party service and technology providers for the purposes of understanding our customer's behaviour, improving our services, and verifying your identity. This may involve the transfer of your information cross border outside of the EEA. It will only be

transferred to third parties who have agreed to protect and handle your data with the same standards expected at Sentenor Bank Corporation.

- As we deem necessary or appropriate under applicable law to: respond to police or government requests both within and outside your country of residence,
- Comply with legal process, to impose our terms and conditions, to protect our operations and those within our group structure, pursue or limit damages that we sustain, and protect our rights, privacy, safety of Sentenor Bank Corporation or members within our group structure.

4. Cookies

We use cookies on our site to collect and store certain information when you access Sentenor Bank Corporation. Cookies are small files that may enable us to know some additional information about you. The information provided by cookies may tell us if you have previously visited our site, if you are using the same computer, if you have previously contacted us for support, if you prefer a specific browser, or if you have certain preferences when using Sentenor Bank Corporation.

5. Your Rights

It is your right to have access to all the personal information we hold about you and your use of our site and services.

Where applicable, you may have certain rights under data protection legislation, including the right to access, correct, update, or delete your personal information; object to or restrict its processing; request to transfer certain of your personal information to another service provider (so called, data portability); or to revoke any consent you have given.

6. Legal Basis for Processing

We will process your personal information only when we have one of the following grounds:

- Based on your consent, for example to send you marketing messages to the extent consent is required by law.
- Where necessary to enter a contract with you and perform our obligations under that contract.
- Where we have a legitimate interest, subject to such processing not overriding your own rights and freedoms.
- Where we have a legal obligation to collect your personal information or otherwise need your Personal Information to protect your vital interests or those of another person; or
- Exceptionally, when necessary, in the public interest, for example when law enforcement agencies request information to investigate a crime.

7. Contacting Us

To contact us regarding any questions you may have for our Privacy Policy, please contact our customer support via chat, or contact your Account Manager of the Sentenor Bank Corporation Compliance Department.

8. Definitions

Please refer to our Terms and Conditions for the defined terms referred to in this Privacy Policy.

9. Updates and Amendments

We reserve the right to amend this Privacy Policy at any time and for any reason. Any variation will not reduce your rights under this Privacy Policy without your consent.

All changes will be posted on our site, and you may be asked to re-confirm your consent to the terms of this Privacy Policy. If the amendments are significant, we may notify you directly. As reference, we will retain prior versions of our Privacy Policy.