

PRIVACY POLICY

1) Introduction

Where the words “we”, “us” or “our” are used in this Privacy Policy, they are all references to CMH Creative LTD. (the “**beWise**”), a company incorporated in Malta and whose registered office is at Level 5, Carolina Court Giuseppe Cali Street, Ta' Xbiex XBX 1424 Malta.

beWise is a business platform that provides invoicing, payment, loyalty, ordering, promotional information and other solutions and services (the “Services”) for freelancers, solo entrepreneurs and small businesses to invoice and receive payments from their customers.

beWise provides the Services through its website (www.bewise.pro), mobile app, and other applications and channels (collectively the “**beWise Platform**”), which applications and channels may change and/or be supplemented from time to time.

“**Freelancer**” refers to an individual or legal entity who establishes a beWise Account or who uses any of the Services, subject to such terms and conditions set out in these Privacy Policy and other applicable contracts.

“**Business**” refers to an individual or legal entity who establishes a beWise account or who uses any of the Services to obtain services offered by Freelancers.

A Freelancer or a Business who agrees to the Terms of Use and/or makes use of the Services shall be referred to as a “**Member**”.

2) Privacy Policy

We treat your information very carefully and we have written this document to help you understand what information we collect, who has access to it and for what purposes.

If you are in the process of creating an account with or have already done so, you should read this document in connection with our Terms of Use. This document is an integral part of the Terms of Use which sets out additional rights and obligations you have in relation to your use the beWise Platform.

We summarise below:

- the types of information about you that we might collect and process;
- how and why we process it, its legal ground;

- with whom and why we share it with;
- how long we process it for;
- how it is processed;
- your rights in relation to the information we hold about you; and
- what to do if you have any questions or complaints.

Please note that, as some types of information processing and sharing are essential to the provision of our services or certain aspects of those services, if you do ask us to stop processing your information we may not be able to provide some of the services or continue to provide the services in the same way. You can always stop the processing of your personal data by closing your account.

As for the processing of personal data, which are obtained via your explicit consent to communicate with you about marketing or to send you our insights, you can ask us to stop processing your information, at any time by emailing us at info@bewise.pro. You can also stop us processing your personal data by closing your account or by emailing info@bewise.pro. The processing that took place until the date you withdraw your consent will be considered lawful.

However, even if you do ask us to stop, we may have lawful grounds for processing your information such as complying with our statutory or regulatory duties or the orders of a court.

We encourage you to read the remainder of this policy to understand more about how your information is used.

2.1. Collecting Your Personal Data:

We collect your personal data when you access our website, register to open an account with us, use our services, make transactions using our services and when you contact us.

We might obtain your personal data from someone else (for instance, from your bank or social media accounts but only where you have agreed that they can share your information). We will let you know if this happens.

We might also automatically collect non-personally identifiable information about you and your computer. For example, when visiting beWise Platform, we may log your computer operating system type, browser type, browser language, the website you visited before browsing to beWise Platform, access times, pages you viewed, how long you spent on a page, page interaction information (such as scrolling, clicks, and mouse-overs) and other information about your use of and actions on beWise Platform.

2.2. Collected Data:

We may process the following types of personal data about you:

- information that may be used to identify you. This includes your title, name, postcode, email address, mobile phone number, date of birth, [...]
- anonymised ID (i.e., a unique customer identifier);
- payment information, (i.e. bank, swift code, account number, bank account, wire transfer, crypto wallet, crypto currency, virtual IBAN, wire transfer) [...].
- information about how you transact using our services. This includes the services you purchase or provide, the transaction ID, the payment amount, the location and time of the transaction, and the outcome of that transaction;
- third party sourced data. Information that you grant us permission to collect, and public information, from third party apps or websites such as, but not limited to, banks (and other financial institutions) and social media sites;
- your preferences. Information about your use of our services including location or demographic data, language preferences, notification settings and stated preferences (e.g. “favouriting” a particular Freelancer);
- network, hardware and website. Information that we obtain from your device or browser when you connect to the website or use our app (such as IP address, operating system and device identifiers). This also includes the use of cookies which we may place on your browser or device to help collect this information or improve your experience on our website; and
- surveys. Information that you have opted to provide to us in response to customer research and satisfaction surveys.

2.3. Purpose of the Processing:

We will only collect and process your personal data when we are allowed to and only the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you;
- Where we have a legitimate interest and your interests and fundamental rights do not override that interest;

- Where we need to comply with a legal or regulatory obligation; or
- Where you have given your consent to specific processing of your personal data e.g., receiving marketing from us

Personal data listed below is collected and processed on the basis of a legal obligation and/or to fulfil obligations arising from the contract and/or on the basis of our legitimate interest, shall be processed in compliance with the General Data Protection Regulation (“GDPR”), Turkish Data Protection Law (“TDPL”) to execute and maintain the contractual relationship and to ensure compliance of our legal obligations.

| | | |
|----------------------------|-----------------------|--------------------------------------|
| Title | Name- Surname | Postcode |
| E-mail Address | Mobile Phone Number | Date of Birth |
| Anonymized ID | Payment Information | Preferences |
| Transaction ID | Payment Amount | Location and Time of the Transaction |
| Outcome of the Transaction | Location | Demographic Data |
| Language Preferences | Notification Settings | Certain Cookies |
| Network | Hardware | Website |
| IP Address | Operating System | Device Identifiers |

- To provide you services. Where we need to perform the contract, we are about to enter into or have entered into with you. To do this we might use your information to identify you,

information about your use of our platform and services, information about your preferences and information about your device and networks. This might include doing things like:

- processing and managing your application for and use of our services and participation in any reward or offer programmes. We have a legitimate interest in this to understand how users interact with our platform or services;

- processing transactions that you initiate using our services. We will do this to perform the contract we have with you;

- communicating with you and other Members about your orders or services, our services, your account with us and to provide support where you contact us. We have a legitimate interest in this communication so we can provide you with adequate support;

- recommending things, we think you'll like such as Freelancers you'd like to obtain services from (for more information regarding our profiling, please see below). We have a legitimate interest in this to develop our services; and

- providing electronic invoices. We will do this as part of performing our contract with you.

Your personal data collected and processed for above purposes is treated in accordance with Articles 6 (b), (c) and (f) of GDPR, Articles 5/2 (a), (c), (ç), (d) and (f) of TDPL and Articles [...] of [...]. In this context, your personal data is processed in terms of legal compliance reasons, in accordance with the relevant laws, directly related to the establishment and execution of the contract and to fulfil the legal obligations of the data controller, to be made public by you for the purpose of purchasing services, and to harm your fundamental rights and freedoms. Data processing is compulsory for the legitimate interests of beWise as the data controller.

We are unable to provide you with our services unless you provide us necessary personal data, as we are required to process this in order to fulfil certain regulatory requirements or our contractual obligations under the Terms of Use.

- To improve our services. Where we have a legitimate interest and your interests and fundamental rights do not override that interest. To do this we might use any of the personal data that we collect as set out in section b above. This might include doing things like:

- measuring the performance of our services. We have a legitimate interest in this to develop our services and to promote our company;

- conducting statistical analysis about how you and other users of our services make use of those services. We have a legitimate interest in this to make improvements to our services or to develop new services, but we will not share statistical analyses about you individually with anyone else;

- providing software updates so that they deliver improved features and functionality (to our services better) or fixing bugs in our software. We have a legitimate interest in this and may also do this to ensure that we can continue to perform our contract with you;

- changing how we run our business, organise ourselves and deliver the services to you. We have a legitimate interest in this to develop our services; and

- personalising parts of the service to your tastes and preferences. We have a legitimate interest in this to develop our business and assess how users interact with our platform or services.

Your personal data collected and processed for above purposes is treated in accordance with Articles 6 (b), (c) and (f) of GDPR, Articles 5/2 (a), (c), (ç), (d) and (f) of TDPL. In this context, your personal data is processed in terms of legal compliance reasons, in accordance with the relevant laws, directly related to the establishment and execution of the contract and to fulfil the legal obligations of the data controller, to be made public by you for the purpose of purchasing services, and to harm your fundamental rights and freedoms. Data processing is compulsory for the legitimate interests of beWise as the data controller.

We are unable to provide you with our services unless you provide us necessary personal data, as we are required to process this in order to fulfil certain regulatory requirements or our contractual obligations under the Terms of Use.

• For regulatory and legal obligations. Where we need to comply with a legal or regulatory obligation, like:

- obtaining and maintaining insurance policies;

- dealing with any requests you make or content you submit;

- managing risk (for instance, by assessing payment and funding risks, identifying, preventing, detecting or tackling fraud, money laundering and other crime and carrying out regulatory checks); and

- complying with any court order or applicable law, regulation or governmental request (e.g. tax authorities) and to protect our rights or property, or the security or integrity of our business or services.

Your personal data collected and processed for above purposes is treated in accordance with Articles 6 (b), (c) and (f) of GDPR, Articles 5/2 (a), (c), (ç), (d) and (f) of TDPL. In this context, your personal data is processed in terms of legal compliance reasons, in accordance with the relevant laws, directly related to the establishment and execution of the contract and to fulfil the legal obligations of the data controller, to be made public by you for the purpose of purchasing services, and to harm your fundamental rights and freedoms. Data processing is compulsory for the legitimate interests of beWise as the data controller.

We are unable to provide you with our services unless you provide us necessary personal data, as we are required to process this in order to fulfil certain regulatory requirements or our contractual obligations under the Terms of Use.

Personal data listed below is collected and processed on the basis of your given clear and explicit consent in accordance with relevant provisions of the GDPR[, TDPL].

| | | |
|--------------------|---------------------|------------------|
| Certain Cookies | Survey | Name – Surname |
| E-mail Address | Mobile Phone Number | Preferences |
| Location | Date of Birth | Demographic Data |
| Device Identifiers | | |

- To communicate with you about marketing or to send you our insights (but only where you have told us you want to receive these communications by giving us your consent to do so and you have not told us to stop sending you messages). To do this we might use data for the means of identifying you and ensuring you are who you say you are, your preferences, your device and network and information about your use of our services. We may also analyse the personal data we hold about you to recommend Freelancers and services that we think you might be interested in. This might include:

- sending you insights; and

- creating personalised service based on your purchasing preferences and behaviour.

We might also use your personal information for getting in touch if we need to tell you about something, like a change to our policies or issues with our platform or services (service actinotices).

Your personal data collected and processed for above purposes is treated in accordance with Article 6/1 (a) of GDPR, Article 5/1 of TDPL.

You can always withdraw your explicit consent for the processing of your personal data for use in beWise’s promotional materials. However, the processing that took place until the date you withdraw your consent will be considered lawful.

2.4. How do we protect your information?

We hold personal data about you at our own premises and with the assistance of third-party service providers. We use third party service providers to perform a number of functions on our behalf including to host our platform, to send messaging on our behalf, to provide

support services to you (including to provide translations to and from the English language) and to process transactions for the purchase of goods and services.

Your personal data may also be processed outside of UAE, pursuant to your explicit consent, by our staff or the staff of our third-party service providers. Such staff may be engaged in, among other things, the provision of our support services.

You have an absolute right to object to the transfer of your personal data outside of UAE. You also have the right to recall your prior given consent. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal. Having said that, please be informed in the event that you recall your prior given consent, it would not be possible for you to continue to use services provided by beWise.

Whenever we share your personal data with third parties, we will take all reasonable steps to ensure that your privacy rights continue to be protected under the applicable data protection legislation.

If data is transferred, pursuant to your explicit consent, we would be happy to provide information pertaining to such safeguards on request. You can contact us for this information by emailing [info@bewise.pro].

We take reasonable measures, including administrative, technical and physical safeguards, to protect your personal data from loss, theft, misuse and unauthorised access, disclosure, alteration and destruction.

We do not store customer card details, and we apply information security practices to keep payment data safe as it is in transit through our platform. 7 Whenever you enter your card and banking information into beWise Platform, those details are encrypted and passed directly to our payment service providers (“PSP”).

Upon receiving your information, our PSP sends us a token (consisting of random letters and numbers) and small amounts of information about your payment (i.e. bank account, wire transfer, crypto wallet, crypto currency, virtual IBAN, wire transfer, last four digits of the card number, the card type and the expiry date).

The token (not your card details) is then used to effect payments for the services you purchase through our platform.

To ensure the required level of payment security, we will always use a PCIDSS compliant payment gateway to store, process and transmit your payment card data.

We reserve the right to change our payments gateway at our sole discretion, provided any such payment gateway meets this security compliance level.

2.5. Who do we share your personal data with and why?

- Transfers to other data controllers

- We might also share your information with a Member to investigate and resolve support issues you experience or where you notify us of a complaint about a Freelancer and/or a Business or the services you purchase from them.

- Where you have linked your bank account or debit or credit card to your account with us and given us consent to share your information, we will share information with your bank.

- Where we do share your information with the PSP, your bank or a Business and/or a Freelancer in this way, they will become a new data controller of your information and will contact you to let you know about this and how they use and protect your information.

- The information we share might include:
 - information that can be used to identify you (such as name, email address and phone number);

 - information about how you interact with beWise Platform or services;

 - transaction data (including about payments you make, refunds and chargebacks and loyalty and rewards you earn and redeem);

 - your preferences (but only as they relate to that bank or Freelancer/Business); and

 - where you have raised a support issue or notified us of a complaint about a Freelancer and/or Business or the services you purchase from them, the nature of the issue or complaint.

- As a fraud prevention measure, we send your full name and postcode to payment service providers when you link a debit or credit card to your account with us. We do this to ensure that your personal details match with the cardholder details and that you are the legitimate cardholder.

- Where you make payments using our services, we share your data with the PSP and they process your transactions. The PSP may share your information with third parties including regulators, your bank and the operators of the card schemes. Where the PSP shares your information with Mastercard, it will process your information under the Mastercard Binding

Corporate Rules (as amended from time to time and currently available here). You have the right to enforce these rules as a third-party beneficiary.

Third party sourced data. We do not share personal data received from third party sources other than PSP, bank, Freelancer and/or Business that, they will become a new data controller of your information and will contact you to let you know about this and how they use and protect your information.

Transaction data. We share transaction information with the Freelancers who are receiving payment or providing rewards and offers on that transaction. We do this so that the Freelancer can reconcile their point of sale data with our data and to allow them to analyse transactions.

Anonymised ID. The ID may be sent to third parties who provide payment services to enable Members and us to match incoming funds to you and the transactions you initiate.

Anonymous purchasing profile. Freelancers that have services offered to the Businesses can obtain reports showing results from analysis conducted using anonymised and aggregated purchasing data to enable them to get a better understanding of the choosing patterns of their services so they can design more effective promotions and campaigns. We do not give them access to the underlying transaction data or information that could be used to identify you individually.

Financial account information such as card details. This information is only held by the payment service provider. We do not hold any sensitive financial information about our customers.

Network, hardware and web, such as browser application and version. We will not share any of this type of data with third parties other than when required to comply or assist with court, orders, applicable law or regulatory or criminal enquiries.

Other uses. We may share your information with third parties, in accordance with the provisions of including law enforcement agencies for any of the following:

- to fulfil our obligations under our Terms of Use, or as required by applicable law or payment method rules;
- to assess financial and insurance risks, risk of fraud, sector risk and credit risk;
- in relation to any breach of, or to enforce, the Terms of Use;
- to recover debt or in relation to your insolvency;

- to develop services and our systems;
- to detect, investigate and prevent fraud or other crime;
- to respond to requests from courts, law enforcement agencies and other governmental or regulatory authorities or agencies; and
- to protect our rights, privacy and property, and that of our customers.

We may also share your information with:

- our service providers. Service providers help us with things like payment processing, website hosting, data analysis, information technology and related infrastructure, customer services, email delivery and anti-fraud services. These third parties are authorised to use your information only as necessary to provide their services to us and we take appropriate steps to ensure that third parties protect your information; and
- third parties in the event of any reorganisation, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings). We shall endeavour to ensure such third parties are bound by confidentiality obligations in relation to such information.

2.6. How long do we process your information for?

Personal Data defined under title “Personal Data collected and processed due to legal obligation and/ or to fulfil obligations arising from the contract” shall be preserved for 10 years following you close your account or ask us to stop processing your information.

For additional information about our retention of your personal data, please contact us by emailing us at info@bewise.pro; or writing to us at [Level 5, Carolina Court Giuseppe Cali Street, Ta' Xbiex XBX 1424 Malta].

In most cases we will process your information only for as long as we need to in order to provide the services or until you close your account or ask us to stop processing your information.

You can ask us to stop processing your information, except for the information processed in order to fulfil obligations arising from applicable legislation, information processed in order to fulfil obligations arising from the contract, information that is necessary for establishing, using and protecting a right, information that is processed on the basis of legitimate interest, as detailed above, or change the way in which we use it by:

- changing the settings in beWise Platform (to effect changes to things like your location settings, language settings, notification settings, access to your contacts list); or

- otherwise, by:

- emailing info@bewise.pro; or

writing to us at Level 5, Carolina Court Giuseppe Cali Street, Ta' Xbiex XBX 1424 Malta

There are some exceptions to this, however. We may have other lawful grounds for processing your information (for example, to comply with our statutory or regulatory duties or the orders of a court). This might apply to information about the transactions you make, when and where you make transactions and the information we hold about you for fraud and other crime prevention purposes. If we do retain your information in this way, we will cease other forms of processing and we will continue to keep your information secure.

2.7. Your rights

You have the right, subject to some restrictions and/or qualifications, to

- request information about whether and how it was processed; learning the purpose of processing and whether they are used appropriately (Right of access) (GDPR art. 15; TDPL art.11 (a), (b), (c)),
- know the third parties to whom they are transferred (TDPL art. 11/ç),
- request correction (GDPR art. 16; TDPL art. 11/d),
- erasure (“right to be forgotten”) (GDPR art.17.; TDPL art.7 and 11/e),
- to request the relevant transactions to be notified to third parties to whom your personal data is transferred in case of correction and deletion (TDPL art. 11/f),
- object to the results obtained as a result of the analysis (GDPR 22; TDPL m 11/g),
- request the compensation of the damage in case of damage due to unlawful processing (TDPL art. 11/ğ),
- demand restriction of processing (GDPR art. 18; TDPL art. 7),
- data portability (GDPR art. 20),
- object to the processing of personal data, including profiling in the case of data processing based on article 6 (1) e) or (f) of GDPR (GDPR art. 21/1),

- object to the processing of your personal data for direct marketing purposes (GDPR art. 21/2).

You can request a copy of the personal data we hold about you, its origin and any recipients of it as well as the purpose of any data processing carried out. For further information, please contact us by emailing info@bewise.pro with the subject “Data subject access request”.

You can correct, restrict, object to our use of or ask us to delete your personal data at any time by emailing [info@bewise.pro] with the subject “Data subject change request”.

You have an absolute right to object to the processing of your personal data for direct marketing. You also have the right to recall your prior given consent. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal, and we may continue processing your personal data based on other legal grounds.

If you have any questions about this document or in relation to how we use your personal data, please contact us by:

- info@bewise.pro; or
- writing to us at Level 5, Carolina Court Giuseppe Cali Street, Ta' Xbiex XBX 1424 Malta.

2.8. Complaints

If you wish to make a complaint about how we process your information, please contact us by

- info@bewise.pro; or
- writing to us at Level 5, Carolina Court Giuseppe Cali Street, Ta' Xbiex XBX 1424 Malta.

If you believe that your personal data has been processed in violation of applicable data protection law and following the rejection of your application by us, or receiving an insufficient reply or not receiving a reply in due time, you have the right to lodge a complaint with the data protection authority

Information And Data Protection Commissioner

Address: Floor 2, Airways House, Triq Il-Kbira

Tas-Sliema SLM 1549, Malta

Phone: +356 2328 7100

Website: <https://idpc.org.mt>

Updating our Privacy Notice

We may update this Privacy Notice from time to time. When we do so, we will post the new version on our website and we will inform you about the new version when you next use our platform.

2.9. Cookies

In order to recognize continuous users, cookies are used and placed on the device that you use when accessing our services. The duration of all cookies expires after a certain time depending on our reason of use such cookies.

You can set your browser (and some mobile device settings) to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of the beWise Platform and our services may become inaccessible or not function properly.

Cookies are used for several reasons:

- To improve the use and the functionality of beWise Platform. If you use the “Remember me” feature to speed up access to your account, we can store your username in a cookie.
- Security reasons. We use cookies to verify your identity.
- Customization of beWise Platform for your personal needs. We can store user preferences in cookies, such as the default language, to personalize the content you're viewing.
- To enhance our services. We use cookies to measure beWise Platform’s use by you, follow up routing data, and sometimes show you different content versions. This information will help us to improve our services and optimize the content we show to users.

Types of Cookies

- Based on Usage.

- Strictly Necessary Cookies. These are cookies that are absolutely necessary for the beWise Platform to function/use properly. These are cookies needed to operate the system,

to prevent fictitious transactions, and if these are blocked, the beWise Platform may not function properly.

- Analytical/Performance Cookies. These cookies let us to analyse and understand the operation of beWise Platform and to improve beWise Platform interacting with you. The use of these cookies may be prevented.

- Functionality Cookies. These cookies let us operate the beWise Platform in accordance with the choices you make. These Cookies permit us to “remember” you in-between visits and provide you with easy access to certain content on the beWise Platform. The use of these cookies may be prevented.

- Advertising Cookies. These are cookies that collect information about your activities on these and other sites to provide you targeted advertising. The use of these cookies may be prevented. However, this prevention will not preclude advertising content on the whole; only ads with generic content will be presented rather than the ads that may be of interest to you.

- Based on Retention Period.

- Persistent Cookies. These cookies remain on your device for a specific period of time or until you manually delete them. These cookies are often used to measure users' preferences and beWise Platform activity and to tailor your experience on the beWise Platform. Such cookies may record, among other things, the time of your visit to the beWise Platform, the time of your current visit to the beWise Platform, which pages you visited on the beWise Platform, how long you stayed on the beWise Platform and how you located the beWise Platform.

- Session Cookies. These cookies are used to separate the user's visit into sessions and do not collect data from the user. These cookies are deleted when the user is inactive for a certain period of time on the web page he / she visits or closes this web page. Target and tracking cookies are used for providing services by third parties on the beWise Platform and to increase the effectiveness of these services. These cookies can remember the web pages and sites you have visited, and may collect personal data, in particular the IP address of the user device. The beWise Platform uses both first-party and third-party cookies for such situations; to collect information, to remember demographic data and your interests, to present targeted ads and to determine ad impressions, and the number of visits. The beWise Platform benefits from social plug-ins that provides links to social networks such as Facebook and LinkedIn. When you visit the beWise Platform and use these plug-ins, the beWise Platform connects directly to the server of the selected social network. Then, the content provided by the plug-ins is forwarded directly from your social networks to your web browser and added to the website you are visiting. Thus, the relevant social network can process your data by accessing it and combine it with the data of your account in the relevant social network.

beWise has no control over the data that social networks process via plug-ins. Personal data policies published by relevant social networks should be carefully read to learn more about the purpose, method and retention period for/by which social networks will process your personal data.

The internet browser you use usually opens as Cookies accepted. However, you can change these settings and inactivate Cookies at any time. If you decide to inactivate Cookies; as explained above, you may not be able to utilize the services we offer on the beWise Platform.

Please do not forget that if you do not set up browser and/or e-mail settings to inactivate cookies, you will be deemed to have approved the use of cookies by us.