

CONFIDENTIAL

COOKIE & PRIVACY POLICY



WAYJA

OCTOBER 2022



Privacy Policy

1. Introduction

This privacy policy explains how Wayja looks after its Users personal data (in all situations where data is collected via the app and the website: <https://wayja.me> . It sets out the user's privacy rights and explains Wayja's approach to privacy and personal data and how the law protects its Users.

Wayja is committed to abiding by data protection laws and to be open and transparent in how it uses Personal Information . Wayja takes privacy seriously and this policy and notice has been drafted in accordance with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation ("GDPR").

2. Wayja's status and details

For the purpose of the GDPR we are the Data Controller (as defined therein) and any enquiry regarding the collection or processing of your data should be addressed to our Data Privacy team at support@wayja.me

3. Information collected

We will collect, process, and store personal data only if it is directly provided to us by Users. Users may do this by accessing the online digital platforms or by becoming a user or enquiring about Services. The personal Information is required:

1. to promote, offer or supply our Services to you; or
2. to improve our Services.

A full list of why we process your information can be found below under " 4. How we use your information". You are under no obligation to provide Personal Information to us. However, much of the Personal Information we request is essential for the provision and quality of our Services. We may not be able to provide you with our Services if you choose to withhold requested information.

When you navigate to websites and mobile applications of brands which are managed by us, including by not limited to (#LetsWayja, #SideBets, Wayja.me and LetsWayja.com) we collect browser and cookie information. In addition, we may also collect your IP address and technical information relating to the device you are accessing our websites from.

During the registration process and when you subsequently use your account, you are requested to submit specific Personal Information including, but not limited to:

1. Your first and last name;
2. E-mail address;
3. Credit card or other payment data; and
4. Phone/mobile number or other contact data.

In addition to the above, you will be asked to create a unique username, password, and pin code combination for your account. This information is required to enable easy access to our Services.

Once you have created an account and have become a registered user, additional information is processed on an on-going basis to ensure that our Services are offered to you in the best possible manner. You must use your unique username, password, and pin to access your account.

When you are logged into your account, we may collect:

1. a record of all internet communications and details of your visits to our websites;
2. technical information relating to the device, such as the device identifier, and browser you use to access our websites;
3. details of transactions you carry out through the site, such as payments, withdrawals and Wayjas;
4. communications with us or our staff which includes calls, emails, and messages;
5. information regarding your location, including IP address.

We also request that you send us additional information to verify your identity. This may include:

1. copies of identification documents;
2. proof of address;
3. confirmation of banking details; and
4. source of funds for your account.

Your documents are always stored and treated in a secure manner.

To ensure your safety and that of the Company, we use Services provided by third parties to help us decide whether to accept transactions from you by assessing your method of payment and the devices you use to visit our websites. These third-party Services check whether the device or method of payment has been utilised for fraudulent or abusive transactions in the past such as reported instances of identity theft, promotion abuse, or credit card fraud.



4. How we use your Information

We use the information we collect to maintain, protect, and improve our Services, and develop new Services.

We process your Personal Information for the purposes of:

1. creating and managing your account;
2. providing you with Services;

if necessary, contacting you via your registered contact information in connection with the management and operation of your account;

1. processing your online transactions;
2. researching your preferences to develop new features, functionality, and Services;
3. ensuring our websites function correctly and identifying any technical issues;
4. complying with all our legal and regulatory requirements;
5. preventing fraudulent activity;
6. determining what marketing and promotional material to offer you should you consent to receive such material; and
7. providing you, unless you have opted out, with information, by the contact methods you authorise us to use, about our Services, and selected third party Services, promotions, and offers.

5. Who we share your Personal Information with?

Trusted third-party entities provide Services essential to our ability to offer our Services to you. These third parties include but are not limited to:

1. banking and payment Services;
2. identity verification companies;
3. those that supply the software Services;

We are required to share some of your information with these entities to offer our Services to you. In these instances, we take reasonable measures to ensure that the third party has appropriate security and privacy arrangements in place to ensure your data is protected.

In compliance with regulatory obligations, we may be required to disclose your information to regulatory authorities. We will also disclose information as required to enforce our terms of use as stated in our Terms and Conditions.

Our online digital platforms may contain links to and from the websites of third-party organisations. Please note that these websites may have their own privacy policies and that we do not accept any responsibility whatsoever for these policies. Please check these policies carefully before you submit any Personal Information.



In the event of any corporate action involving the Company, which may result in the Company having to transfer Personal Information to a third party, you will be notified via email or notice posted on our websites to explain the identity of the new Responsible Party and your options regarding your Personal Information .

6. Marketing and Opting Out

The Company reserves the right to process Personal Information for marketing purposes. In certain limited circumstances, we also reserve the right to provide this information to our third-party partners for the purpose of marketing our Services to you provided that you have already consented or give us your consent to do this.

We request your consent to market to you when you first create an account with us, you can choose not to receive marketing/promotional material at any time. By opting out or denying such consent has no influence on the registration of an account.

If you have opted out of marketing from us, we will take all reasonable steps to ensure you no longer receive promotional material about our Services.

Even if you unsubscribe from our marketing mailing list, we may continue to send out periodic e-mails and/or electronic messages informing you of technical, or security issues related to your service, or providing periodic updates or information relating to the service or any other form of communication we are obliged to send you in terms of legislation.

Please note that should you opt out of receiving marketing/promotional material from us, there might be a delay in removing you from our marketing/promotional lists. We ask that you give us a period of 10 days from opting out to remove you from our mailing list. Should you continue to receive marketing/promotional material after 10 days from opting us, we ask that you notify us in order to investigate why you have not been removed from the mailing list.



7. Your Rights

We respect your privacy rights and therefore you may contact us at any time and request the following:

1. the Personal Information we hold about you;
2. to rectify your Personal Information if it becomes inaccurate or incomplete;
3. to have incomplete Personal Information completed. This may include providing a supplementary statement;
4. to erase your Personal Information if:
 - your Personal Information has been processed unlawfully by us; or
 - your Personal Information is no longer necessary for the purposes for which it was collected by us; or
 - You object to processing and there is no overriding legitimate interest for continuing to process your Personal Information .
5. to restrict our processing of your Personal Information if:
 - you contest the accuracy of the Personal Information held by us (for a period enabling us to verify the accuracy of the Personal Information);
 - our processing activities are unlawful; or
 - we no longer need your Personal Information , but you would like us to retain it to ensure its continued availability to you in connection with any legal claims.

You undertake to update us if there are any changes or inaccuracies in your Personal Information.

Please note that objecting to our processing of your Personal Information will result in us being unable to continue to offer our Services to you which may lead to us closing your account. When requesting any of the above information from us, you have the right to ask that your Personal Information be provided to you in a generally understandable format.

Kindly note that the above rights are not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse your request. For example, we may refuse your request in instances where we need to process the Personal Information to exercise or defend legal claims. In addition, in certain instances, your Personal Information may have been destroyed, erased, or made anonymous in accordance with our record retention obligations and practices.

To exercise your rights, you are required to submit a request detailing what information you wish to enquire about, together with proof of identity to customer support at support@wayja.me, We may then request further details in order to process your request.

If you are not satisfied with how we have processed your Personal Information and want to raise a complaint, please contact us directly at support@wayja.me.



8. Cookie Policy

Cookies are text files containing a small amount of information that are downloaded to your device when you visit a website. Most websites utilise cookies to improve your online experience and to ensure that content and functions are delivered and used more effectively.

Cookies perform various different functions. For example, some cookies are session cookies which are downloaded to your device temporarily for the period that you spend browsing a particular website. These cookies might allow you to navigate between pages more efficiently or enable websites to remember the preferences you selected. Other cookies are persistent cookies which can be used to help websites remember you as a returning visitor or to ensure the online adverts you receive are more relevant to your specific needs and interests.

The primary use of cookies on our websites, either directly by the Company or our chosen partner(s), is to:

1. enable you to save time and facilitate future access to the site;
2. identify how people navigate through our website to improve our service, content, and the effectiveness of our communications;
3. collect and share device data to detect and prevent devices associated with fraud and money laundering;
4. identify account and device irregularities and detect and prevent fraudulent transactions and abuse of our customer accounts and our Services.

You agree that the Company may, from time to time, place cookies on your device to save information (such as your username, password, personal details, e-mail address, and technical device information such as the model and its IP address) to make full use of the functionality and Services on our websites and to allow your browser to identify you as a user. This ensures that you do not have to re-enter your information each time you visit our websites. These cookies cannot be used to run programs or deliver viruses to your computer and are uniquely assigned to you. Additionally, these cookies can only be read by the web server(s) that placed the cookies on your device.

At any time, you can amend your browser settings to block some or all cookies from the Company. However, if you block cookies from the Company, some or all the of functionality of our websites may not perform as intended. For example, you may not actually be able to place any Wayjas.

Further information about cookies and how to delete them from your browser can be found at: <http://www.allaboutcookies.org>



9. Transfer and storage of your Personal Information

The data we collect from you may be transferred to, and stored at, a destination outside of the United Kingdom. It may also be processed by staff operating outside of the United Kingdom who work for the Company or for one of our suppliers. Such staff may be engaged in, among other things, the fulfilment of your request, the processing of your payment details, the provision of support Services, or any other activity related to servicing any of your requests that you might place with us from over the course of your time with us.

We will take all reasonably necessary steps to ensure that your Personal Information is treated securely and in accordance with this privacy policy by making sure such transfers comply with applicable laws. Once we have received your information, we will use strict procedures and security measures to prevent unauthorised access and ensure the integrity and availability of Personal Information.

We are required to keep full records of all transactions together with any identification provided. We will hold your Personal Information on our systems for as long as is necessary under our legal obligations.

10. Retention

Except as otherwise permitted or required by applicable law or regulatory requirements, we endeavour to retain your Personal Information only for as long as we believe is necessary to fulfil the purposes for which the Personal Information was collected (including but not limited to for the purpose of meeting any legal, accounting, or other reporting requirements or obligations). We may, instead of destroying or erasing your Personal Information, make it anonymous such that it cannot be associated with or traced back to you.

11. How we keep your information secured

We take great care in implementing and maintaining the security of the Services and your information. We have put in place appropriate physical and technological safeguards to help prevent unauthorised access, to maintain data security, and to appropriately use the information we collect online. These safeguards vary based on the sensitivity of the information that we collect and store.

We employ industry standard procedures and controls to ensure the safety of our Users' information, such as:

1. securing network topology, which includes intrusion prevention and firewall systems;
2. encrypted communication;
3. authentication and access Control; and
4. external and internal audit tests.



Although we take reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorised access or abuse the Services. We make no warranty, express, implied, or otherwise, that we will prevent such access.

12. Support

If you wish to unsubscribe from marketing communications, please contact Customer Support on: support@wayja.me

If you have any questions (or comments) concerning this Privacy Policy, you are welcome to send it to our Information Officer at: support@wayja.me for attention to the: Information Officer.

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THANK YOU!

REECE@WAYJA.ME

CLINTON@WAYJA.ME

