



PRIVACY POLICY

INTRODUCTION

This website is the property of Peak Card Services Ltd. Peak Financial Services (which are trade names of Peak Card Services Ltd.), is determined to protect your privacy. All data is collected, transferred, processed and maintained in accordance with the principles contained within the Data Protection Act 1998 of the United Kingdom and the Privacy and Electronic Communications (EC Directive) Regulations 2003, and with all relevant European Union regulations and directives. Peak Financial Services closely watches the development of international law regarding data protection, and is willing to build into its data policy any new progress.

We are aware of our responsibility to keep your personal data and information confidential and secure. Peak Financial Services undertakes technical, administrative and legal measures to keep any information, which it obtains in connection with our services as Program Manager. Peak Financial Services grants and makes sure that it will not share this information with other people or businesses, other than stated in this policy, without your prior consent.

Our Privacy Policy is designed to inform you about the information we collect, how we use and share it, and your options regard to that collection and use. As we may periodically update our Privacy Policy, you should review it often for changes.

The following statement explains our policy regarding all the information that is shared by a visitor with us whether directly via www.peakfinancialservices.eu directly or via email.

HOW WE COLLECT AND USE INFORMATION

To enable us to do business with you, we need to obtain information using "Contact us" online form or email you send to us, which includes your name, your position and company name, your work contact details (email address and phone number)

We may collect and process the following information:

- Personal details:
 - Your full name, address, email address, telephone number, date of birth, and any proof of your identity and/or address that Peak Financial Services may request
 - Other personal, phone or social network contact information
- Business contact details:
 - Position, department and company name, work phone number, work email address,
- Other information:
 - Your participation in any promotion sponsored by us,
 - Correspondence that you send us,
 - Calls that we make to you or you make to us,
 - Surveys that you complete,



During the course of your visit to our website, your computer may be issued with cookies. Please, see "Cookies" section of this Privacy Policy for more details. We collect information about your device and your visit, including:

- Your IP address
- Your browsing, searching and buying activity
- Web addresses of the sites you come from and go to next
- Information about your connection, including your device's browser, operating system, platform type and Internet connection speed

Information Peak Financial Services Collects from Third Parties about You:

- For the purpose of the legal obligations of Peak Financial Services to prevent fraud and money laundering, Peak Financial Services will obtain information about you from third party agencies, including your financial history, county court judgments and bankruptcies, from credit reference and fraud prevention agencies when you do business with us, and at any time when we feel it is necessary to prevent fraud and minimize our financial risks.

You have the option to change or revise your personal data (except of your user name, first name, last name, date of birth and country) at any time. With contacting us by email you can request the modification. Send email to help@peakfinancialservices.eu or use the "Contact Us" online form on our website.

Peak Financial Services will use the information provided by you only for the purposes of the use of services provided, and with the goal to share advertising and reference information with you, furthermore to develop and improve our overall service to you. Peak Financial Services grants and makes sure that your personal information cannot be accessed by and will not be given to unauthorized parties. We give access to your personal information only to those employees who require it to provide our services.

Marketing emails you receive from Peak Financial Services include an "Unsubscribe" instruction usually found at the bottom of the email that you may use to opt out of receiving future marketing-related emails.

Peak Financial Services grants, that it will not disclose any such information outside of its own administrative system except in the limited circumstances described below, as permitted by applicable law, or with your express permission:

- In order to prevent fraud and money laundering, to fraud prevention agencies and other organizations who may use the information, or in order to assist Peak Financial Services in investigating suspected violations of our Terms and Condition.
- To persons acting as Peak Financial Services agents under a strict code of confidentiality.
- As required by law or regulation.

DATA HANDLING OUTSIDE THE EEA

The data that Peak Financial Services collects from you may be transferred to, and stored at, destinations outside the European Economic Area ("EEA") for the reasons set out below:

- If this is necessary for providing you with the services you request. For example if you transfer funds to a merchant that is not located in the EEA, it will be necessary to send your details to that merchant,



- In case of a partner company of Peak Financial Services, store or process your data in accordance with the operational requirements of Peak Financial Services, where you have consented to receive marketing material from our group companies,
- In case that anti-fraud agencies, credit reference agencies and other service providers are based outside the EEA and require access to your data to perform their obligations and provide services to you,

Nevertheless, Peak Financial Services have taken and will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy no matter where it is located. Peak Financial Services will not transfer personal data outside the European Economic Area unless Peak Financial Services is fully convinced that the country or territory of destination provides adequate security in accordance with the Eighth Principle of the Data Protection Act 1998.

Furthermore, Peak Financial Services will not transfer personal data to any third party, including any data processor, situated outside the European Economic Area in a third country that is not subject to a finding of adequacy by the European Commission under Article 25(5) of Directive 95/46/EC, unless and until Peak Financial Services and the data processor enter into the standard contractual clauses for the transfer of personal data to processors established in third countries as updated by Decision 2010/87/EU of the European Commission dated 5 February 2010, or other substantially similar provisions.

THE GUIDELINES OF PRIVACY POLICY

For the best and most secure way of data handling, Peak Financial Services follows the following guidelines, when accessing and dealing with your personal data:

- Using a secure and highly protected network and servers for the transmission and storage of your data.
- Holding your personal information only as long as it is absolutely necessary.
- We will not sell, trade, or rent your personal information to other people or businesses unless we have your consent. Even with your consent, Peak Financial Services will only share your information with carefully chosen, reputable and trustworthy third parties.
- We react as soon as possible for your request to change or delete your personal information, but latest in 10 days after the receipt of such a request.
- We may monitor and record any telephone calls for service improvement and tracking reasons.

TECHNICAL SECURITY INFORMATION

For the sake of the highest possible protection of your personal data, Peak Financial Services does not store any personal information. Your personal information is stored at data processor and handling partners of Peak Financial Services, which are PCI compliant in connection with your sensitive information, and must be a signatory to the International Safe Harbor Privacy Principles. These data processors are storing or processing your data in accordance with Peak Financial Service's internal operational requirements and procedures in order to administer the services you require or in connection with anti-fraud measures. In case that Peak Financial Services needs access to your personal information, it connects to these servers through a secured API connection. Every data goes through the use of Secure Socket Layer (SSL) encrypted



protection. Peak Financial Services has taken and will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy no matter where it is located.

COOKIES

When visiting the Peak Financial Services website, your computer may be issued with cookies. Cookies are text files, which identify your computer to a server. Cookies do not in themselves identify you as an individual, just the computer you are using. We may gather information about general Internet use by using a cookie file that is downloaded to your computer. Where used, these cookies are downloaded to your computer automatically. This cookie file is stored on the hard drive of your device as cookies contain information that is transferred to your device's hard drive. They help us to improve our website and the service that we provide you. We do not collect or store any personally identifiable information using the cookie.

Cookies are commonly used on the Internet and do not harm your system. Cookies have several way of use, such as helping the customer experience on a website, to maintain the security of a website, or to make sure that a user does not have to continuously log into a website. All computers have the ability to decline cookies. In order to decline the cookies, please modify your browser's settings. Please note, that should you choose to decline cookies, you may be unable to access particular parts of our website. We will not sell or distribute cookie information without your prior consent.

UNDER AGED PERSONS

Persons under 18 years old are allowed to give information to Peak Financial Services' website only with their parent or guardian's permission. Since Peak Financial Services currently does not provide its services to persons under 18 years old, therefore we kindly ask under aged people not to provide Peak Financial Services with any data.

CHANGES TO THIS STATEMENT

Peak Financial Services upholds the right, without notice, to change this Privacy Policy to keep it updated, and in accordance with its best practices. Any new Privacy Policy will be effective from the time that it is posted on the website. You can receive notification about any changes of the Privacy Policy, please subscribe to our newsletter.

LINKS TO OTHER WEBSITES AND YOUR CONDUCT

Peak Financial Services draws your attention to the fact that its website includes links to other websites. These are outside the control of Peak Financial Services and not covered by this policy. If you access those websites via the links, use of those websites will be in accordance with the privacy policy of those website operators, which may differ from ours.

However, this high level of protection can only be effective if you follow certain security practices yourself. You must never share your login details with anyone. If you are concerned that any of your login details have been compromised, you can change them any time once you are logged on but you should always also immediately contact us and tell Peak Financial Services' why you think your login details have been compromised.

PHISHING



Phishing is the name given to attempts to steal personal details and financial account details from a website user. "Phishers" use fake or emails to lead users to counterfeit websites where the user is tricked into entering their personal details, such as credit card numbers, user names and passwords.

PEAK FINANCIAL SERVICES WILL NEVER SEND EMAILS ASKING YOU FOR SUCH DETAILS AND IT'S STAFF WILL NEVER ASK YOU FOR YOUR PASSWORD.

If you do receive such an email or are asked for your password by anyone claiming to work for us please forward the email or report the incident to help@peakfinancialservices.eu

FURTHER INFORMATION

Further information about data protection is available online at the website of the Information Commissioner: www.dataprotection.gov.uk

CONTACTING US

If you have any questions, concerns or suggestions related to our Privacy Policy or our privacy practices you may contact us at: help@peakfinancialservices.eu