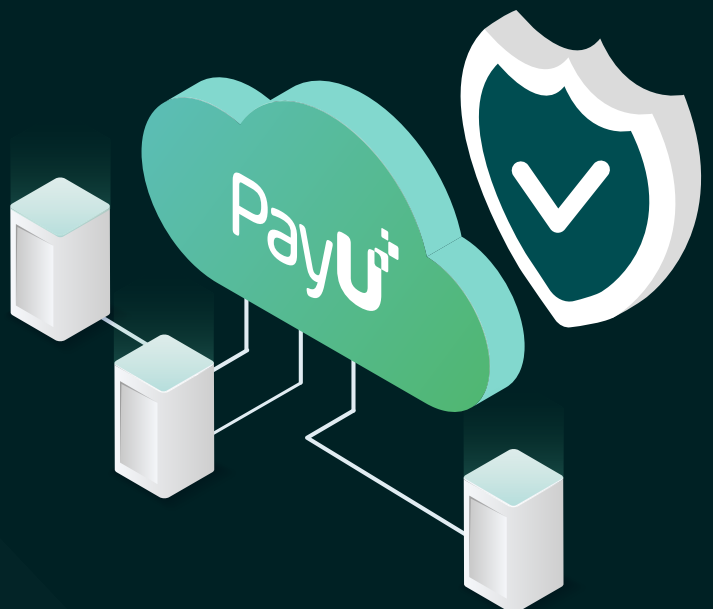




Personal Data Governance Policy



1. Introduction

This Personal Data Governance Policy lays down those principles and requirements that underpin our approach to the protection of personal information throughout PayU and its businesses. This Policy is aligned with the Prosus N.V. group policy on Privacy Governance and builds upon it to meet the needs of PayU obligations.

The objectives of this Policy are:

- to promote a common approach with respect to the protection of personal information;
- to ensure that our unifying privacy principles and requirements as per various legislation and best practices are known and operationalized.

The term “privacy” is used in this policy as an umbrella term to encompass concepts of autonomy, data ethics, security and responsible data management.

The term “personal data” is used in this policy to describe any information relating to an identified or identifiable natural person (individual). The term personal data is used interchangeably with “personal information.”

2. PayU’s Privacy Strategy

The processing of personal information plays a pivotal role in PayU’s strategic ambitions. An intelligent, fair and ethical use of personal information while ensuring a robust privacy governance structure, privacy program and privacy team is key to ensuring a competitive advantage in the marketplace as a global fintech organization.

A key element of PayU’s Privacy Strategy is to improve the quality of personal data and maintain trust - in line with our Code of Business Ethics and Conduct - amongst those whose personal information is being processed by us.

The PayU Global Privacy Program and its underlying principles help empower individuals and its businesses to be a sustainable data driven organization.

3. Accountability

PayU recognizes that each business must be accountable to operationalize the privacy principles under the PayU Global Privacy Program in a way that is adapted to its circumstances, business models, legislation, geography, and culture.

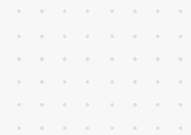
PayU’s CEO and the appointed leadership teams hold the ultimate responsibility for the implementation of this Policy and its principles, throughout their businesses and endorse the PayU Global Privacy Program as a mechanism to support embedding privacy and data protection into PayU’s processes and systems.

"More than ever, as a Fintech leader that understands the role of technology and data in building a world without financial borders, our Global Privacy Program - endorsed by each of our businesses - is one of the cornerstones in securing the trust of individuals, including our partners, customers and employees."

4. Privacy Principles

PayU and its businesses are expected to adhere to the following privacy principles when processing Personal Information:

- **We are fair and ethical in the processing of your personal information.**
- **We are transparent about our data practices.** We notify individuals about how and when we collect their personal data, reasons for such collection, and the basis by means of privacy and cookie statements that are available on our websites and through our [Privacy Portal](#). Such statements allow individuals to understand what information is collected, for what purposes, what is done with the personal information, how we protect it, whom it is shared with, how individuals can exercise their rights and who can be contacted for queries and complaints.
- **We are committed to empowering individuals to make choices about their personal information.**
- **We only collect as much personal information that we need.** We collect personal information that is necessary for the purpose of processing to provide our services.
- **We ensure that personal information is accurate and up to date.** We make sure that personal information is up-to-date, complete and accurate by establishing the necessary procedures.
- **We protect personal information when it is shared with third parties.** We perform due diligence to ensure that personal information we share with vendors, merchants and partners, will remain safe and meet the same or similar requirements and principles that we place on ourselves.
- **We ensure appropriate security of personal information.** We take responsibility to ensure that known privacy threats are accounted for, and we implement appropriate administrative, technical, personnel, physical and contractual measures to safeguard personal information against loss, access, theft and unauthorized use or modification.

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- **We embrace privacy by design and by default into the data lifecycle.** Privacy and security considerations are embedded throughout the design, development and management of processes, systems and applications.
 - **We ensure confidentiality.** We only disclose or share personal information based on the right reasons and safeguards. This means that we do not share or disclose any personal information when there is no justification to do so.
 - **We retain personal information only for as long as we need it.** We keep personal information for the purposes for which it was collected or required by law. Once no longer needed, we take measures to ensure the personal information is appropriately disposed of.

As an organization, we engage with Governments responsibly. Governments around the world are interested in data held by private companies and we have procedures in place to handle these requests.

5. The PayU Global Privacy Program

PayU adopted a Global Privacy Program and Privacy Principles based on internationally common principles and standards applicable to all business units. The PayU Global Privacy Program consists of the following elements:

- **Governance and Executive Buy-in and Oversight.** The senior management embraces the importance of data and privacy and its relationship to trust, brand, growth, risk and compliance. The PayU Leadership teams designate, define and ensure that there are sufficient resources within its businesses dedicated to the continuous improvement of privacy and data protection via the PayU Global Privacy Program.
- **Privacy Requirements.** Privacy requirements are integrated into projects, initiatives, development, campaigns, etc. Such privacy requirements include embedding privacy and security by design and default into PayU's systems, processes, and products.
- **Policy-Setting.** The PayU Privacy Team develops and maintains the necessary policies and procedures required to implement the PayU Global Privacy Program.
- **Training and Awareness.** We offer general and specific privacy trainings to staff, and where needed, third parties.
- **Know your Data.** We maintain an inventory of its processing activities, vendors and systems used for processing information. A new processing activity or a change to an existing processing activity is adequately recorded to identify, in particular personal information held, purposes for which personal information are processed, systems and assets used to manage the personal information, the geographies of any personal data storage or transfers and access rights to the personal information.

- **Assessment and Vendor Management.** Where personal information is shared to external third parties, we make sure that we: (a) assess their prospective third party to evaluate compatibility with our PayU Global Privacy Program, (b) implement confidentiality or data processing agreements when required, and (c) audit vendors based on risk-based criteria.
- **Privacy Legal and Data Protection Compliance.** PayU's Chief Privacy Officer leads a privacy team, including privacy lawyers, to address and collaborate with the PayU Legal and Compliance team to navigate the worldwide regulatory and legal obligations of each of its business units.
- **Consent Management.** We ensure that consents, where required, are managed in accordance with applicable laws.
- **Complaint Resolution and Data Subjects Rights.** PayU's privacy complaint reporting mechanisms address both internal and external complaints, including data subjects rights.
- **Controls and Audit.** We co-ordinate with internal and external audit functions to verify, document and report on the implementation of the PayU Global Privacy.

6. Privacy Expertise

The Privacy Team is led by the **Chief Privacy Officer**. The Chief Privacy Officer designs and develops the PayU Global Privacy Program. The Chief Privacy Officer regularly updates and reports to the PayU CEO and the Leadership team with respect to the continuous implementation of the Global PayU Privacy Program in each of its businesses. The Chief Privacy Officer leads a global team to address PayU's worldwide regulatory and legal obligations relating to privacy and the PayU Global Privacy Program.