

PRIVACY POLICY

Introduction

In connection with using Omnego App products at your discretion, we respect your rights with respect to our collection of your Personal Information and it will only be collected, used and disclosed as provided for in this policy or as otherwise specifically consented to by you.

Scope

This policy applies to Personal Information about users of our Apps that is collected and used by Omnego in connection with the Omnego app products.

Definitions

To better understand this policy, Omnego has set out some basic definitions to use when reading and interpreting it.

- Collection: the act of gathering, acquiring, recording, or obtaining Personal Information from any source, including third parties, by any means.
- Consent: voluntary agreement to the collection, use and disclosure of Personal Information for defined purposes. Consent can be either express or implied and can be provided directly by the individual or by an authorized representative. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from the circumstances or from an individual's action or inaction.
- Disclosure: making Personal Information available to a third party.
- Personal Information: information about an identifiable individual that is recorded in any form, **but does not include** aggregated information that cannot be associated with a specific person. For a customer, such information does not include that which is aggregated in such a manner that it cannot be connected to him/her and/or information which is publicly listed in a written or online directory or typically made available through directory assistance.
- Use: the treatment, handling and management of Personal Information by and within Omnego apps.

Collection of Personal Information

We only collect Personal Information that you consciously provide or that we otherwise receive in connection with our provision of the Services. Such information may include name, address (optional), E-mail, Store locations, number of stores, mobile or loyalty card number, image/photo of a ID or loyalty cards, that may be stored on Omnego app servers for the purpose of support or administration databases.

We may also collect Personal Information if you contact us, through e-mail, telephone conversations or the completion of forms, for support and other inquiries, or otherwise subscribe to or utilize ancillary Services to Omnego.

When you access our website, we, or companies we hire to track how our website is used, may place small data files called "cookies" on your computer, tablet or smartphone device. We send a "session cookie" to your computer or device when you log in to your account or browse our webpages. This type of cookie helps us to recognize you if you visit multiple pages on our site during the same session, so that we don't need to ask you

for your password on each page, or to otherwise assist in associating one request with another in the same browser session. Once you log out or close your browser, this cookie expires and no longer has any effect.

We also use longer-lasting cookies for other purposes such as to display your e-mail address on our sign-in form, so that you don't need to retype the e-mail address each time you log in to your account. We encode our cookies so that only we can interpret the information stored in them.

Accountability

Omnego is responsible for Personal Information under its control and has designated its Privacy Officer as accountable for the company's compliance with the following principles.

Omnego is responsible for Personal Information in its possession or custody.

In the event that we disclose your Personal Information to third parties or to a data storage or processing company with access to your Personal Information, as appropriate, Omnego commits to contractually bind such entities to abide by, or otherwise ensure that such entities will abide by, the fundamental terms of this policy and applicable laws, including with respect to their capability to use, disclose and retain such Personal Information.

Omnego shall implement policies and practices to give effect to:

- Implementing procedures to protect Personal Information;
- Establishing procedures to receive and respond to complaints and inquiries;
- Training staff and communicating to staff information about the organization's policies and practices; and
- Developing information to explain the organization's policies and procedures.

Purposes

Omnego generally collects Personal Information only for the following purposes:

To provide the Services to you;

To establish and maintain responsible commercial relations with and pertaining to you (which will include, but not be limited to: communication, account verification, provisioning of services and product, and image backup as applicable);

To meet legal and regulatory requirements; and

To administer and manage its business operations.

Consent

The knowledge and consent of the individual are required for the collection, use or disclosure of Personal Information, as follows and except in certain circumstances as described below:

In rare circumstances, (for example, legal, medical or security reasons) it may be impossible or impractical to seek consent. When information is being collected for the detection and prevention of fraud or for law enforcement, seeking the consent of the individual might defeat the purpose of collecting the information.

In obtaining consent, Omnego will use reasonable efforts to ensure that you are advised of the identified purposes for which Personal Information collected will be used or disclosed.

Your use of the Services in seeking to download and otherwise use and leverage Omnego will be considered consent to collect, use and disclose the associated Personal Information for all identified purposes described herein. In addition, your use of the Services will be considered consent for you to receive push notifications pertaining to the provisioning of the Service by Omnego as well as offerings, messaging and content from merchants to which you choose to subscribe for cards to include and use in the Omnego app software.

You may withdraw consent in writing at any time, subject to legal or contractual restrictions and reasonable notice.

Omnego may inform the individual of the implications of such withdrawal.

Use and Retention of Personal Information

Personal Information will be retained only as long as necessary for the fulfillment of the purposes listed herein or otherwise consented to.

Generally, all Personal Information collected by Omnego is to provide you with the Services (i.e., communicating between the Omnego application to be downloaded to or in your POS device, mobile device, computers, servers and our centralized Omnego platform) as well as for such reasonably ancillary use in connection with such Services and your use and benefits of OMNEGO.

Only OMNEGO's employees or contractors, with a business need to know, or whose duties reasonably so require, are granted access to your Personal Information.

Personal Information that is no longer required to fulfill the identified purposes will be destroyed, erased or made anonymous according to the guidelines and procedures established by OMNEGO. It is OMNEGO's practice to retain your account registration information after you have registered as well as stores, locations or business venue data so as to support you and provide future Services to you as you may direct from time to time.

Except as provided for in this policy, we will not sell, rent, lease, commercially exploit or otherwise disclose your Personal Information or data to third parties unless: (i) required by law or to cooperate with any bona fide legal investigation; (ii) required to protect the legal interests of OMNEGO, including in connection with a potential financing, merger or acquisition in which case the applicable counterparties shall be placed under obligations of confidentiality; or (iii) you provide consent to such disclosure where such consent may not reasonably be implied according to this Policy or otherwise. Please note that the laws on processing and otherwise concerning personal information may differ between countries, and as OMNEGO may hold and process Personal Information in Switzerland, Germany, Italy, France and other countries, the laws and standards in those countries may diverge and possibly conflict.

Accuracy

At your request and notification, OMNEGO will update Personal Information as necessary to fulfill the identified purposes. You always have the right to request that we delete, destroy, return, amend or update your Personal Information in our possession as you may direct, subject to reasonable notice and your acceptance of the implications as to OMNEGO ability to provide the Services to you.

Security

Personal Information will be protected by security safeguards appropriate to the sensitivity of the information.

Any Personal Information in our possession is stored electronically, either on our server (which may be hosted offsite) or on other electronic storage media that may be retained as part of your files or otherwise.

We have security measures in place to protect against the loss, misuse, access to or alteration of your Personal Information and data under our control.

We operate computer networks that are protected by industry standard firewalls and password protection. Appropriate physical and managerial security is also in place, including but not limited to selected encryption as identified above and the execution by our employees and contractors of a confidentiality/non-disclosure agreement as a standard practice of our hiring, employment and contracting.

While we cannot guarantee that loss, misuse or alteration to your data will not occur, we will use our resources and expertise to attempt to prevent such occurrences.

We commit to providing a minimum of an annual review and training with respect to this policy among our staff with potential access to your Personal Information.

Openness and Access

OMNEGO will make readily available to you information about its policies and practices relating to the management of Personal Information. OMNEGO will make this Privacy Policy available to you prior to providing the Services.

You may access or inquire about your Personal Information in our possession at any time during our business hours. The Personal Information requested will be provided within a reasonable time, and at minimal or no cost to you.

In certain situations, OMNEGO may not be able to provide access to all of the Personal Information it holds about you. Exceptions may include information that is prohibitively costly to provide, information that cannot be disclosed for legal, security or commercial proprietary reasons, or information that is subject to solicitor-client or litigation privilege. OMNEGO will provide the reasons for denying access upon request.

Challenging Compliance

In the event of any dispute, complaint or problem with respect to this policy and related OMNEGO practices, a definitive procedure for resolution has been established as outlined below. OMNEGO is committed to resolving any such issues promptly, justly, objectively and, where possible, confidentially.

A written outline of the issue should be forwarded directly to the Privacy Officer of OMNEGO, who in turn will investigate, examine and evaluate all the facts. Based on the information gathered and other related details, a formal written decision will be completed and will be forwarded to you within 30 days of the Privacy Officer's receipt of your complaint. During investigation of the issue, it may be necessary for further Personal Information to be shared with the Privacy Officer or other appropriate parties internal or external to OMNEGO. In all cases, OMNEGO will remain responsible for the protection of all such Personal Information.

Notification of changes

We may update this privacy policy from time to time, so please review it periodically.

Contact Us

For further information concerning this privacy policy or its application or for access to your Personal Information, please write to us, in English only, email in English only at, info@Omnego.com with "Privacy Officer" in the subject line.

Omnego™

The Engagement App Platform