



PRIVACY POLICY

A. Overview

In order to operate the Cards4Ads platform and to reduce the risk of fraud, Blakeney Ventures Limited (“Cards4Ads” or “we”) must ask you to provide us information about yourself and your credit card and/or bank account. This Privacy Policy describes the information we collect and how we use that information. Cards4Ads takes the privacy of your personal information very seriously and will use your information only in accordance with the terms of this Privacy Policy. We will not sell or rent your personally identifiable information or a list of our customers to third parties. However, as described in more detail in Part C below, there are limited circumstances in which some of your information will be shared with third parties, under strict restrictions, so it is important for you to review this Privacy Policy. This Privacy Policy applies to all services that are hosted on the Cards4Ads.com web site, whether the services are offered by Blakeney Ventures Limited, Cards4Ads or by its subsidiaries.

By accepting the Privacy Policy and User Agreement in registration, you expressly consent to our use and disclosure of your personal information in the manner described in this Privacy Policy. This Privacy Policy is incorporated into and subject to the terms of the Cards4Ads User Agreement. This Privacy Policy will take effect on August 31, 2016. This Privacy Policy was last updated on April 12, 2018.

Notification of Changes

This policy may be revised over time as new features are added to the Cards4Ads platform or as we incorporate suggestions from our customers. If we are going to use or disclose your personally identifiable information in a manner materially different from that stated at the time we collected the information, you will have a choice as to whether or not we use or disclose your information in this new manner. Any material changes will be effective only after we notify you by email with at least 30 days’ notice of the amended Privacy Policy (if you have closed your Cards4Ads account, you will not be contacted to notify you of the amended Policy and your personal information will not be used or disclosed in this new manner). We will post the amended Privacy Policy prominently on our Web site so that you can always review what information we gather, how we might use that information, and whether we will disclose it to anyone. Please check the Cards4Ads Web site at www.Cards4Ads.com at any time for the most current version of our Privacy Policy.

Cards4Ads and other pages on the Cards4Ads Web site may include links to third party Web sites. These sites are governed by their own privacy statements, and Cards4Ads is not responsible for their operations, including but not limited to their information practices. Users submitting information to or through these third party Web sites should review the privacy statement of these sites before providing them with personally identifiable information. Children are not eligible to use our service and we ask that minors (under the age of 18) do not submit any personal information to us or use the service.



B. Information We Collect

Required Information

To open a Cards4Ads account, you must provide your name, address, phone number. In order to make payments through Cards4Ads, you must provide credit card, debit card or bank account information (bank account information is required to make payments totalling more than \$500.00 EUR). This required information is necessary for us to process transactions, issue a new password if you forget or lose your password, protect you against credit card fraud and checking account fraud, and to contact you should the need arise in administering your account.

Information About You From Third Parties

In order to protect all our customers against potential fraud, we verify with third parties the information you provide. In the course of such verification, we receive personally identifiable information about you from such services. In particular, if you register a credit card or debit card with Cards4Ads, we will use card authorization and fraud screening services to verify that your card information and address matches the information that you supplied to Cards4Ads, and that the card has not been reported as lost or stolen. If you register your online business with Cards4Ads or if you send or receive high overall payment volumes through Cards4Ads, in some circumstances we will conduct a background check on your business by obtaining information about you and your business from a credit bureau or a business information service. If you incur a debt to Cards4Ads, we will generally conduct a credit check on you by obtaining additional information about you from a credit bureau, to the extent permitted by law. Cards4Ads, at its sole discretion, also reserves the right periodically to retrieve and review a business and/or consumer credit report for any account, and reserves the right to close an account based on information obtained during this credit review process.

Additional Verification

If we cannot verify the information that you provide, or if you request a withdrawal by check to an address other than your verified credit card billing address, we ask you to send us additional information by fax (such as your drivers' license, credit card statement, and/or a recent utility bill or other information linking you to the applicable address), or to answer additional questions online to help verify your information.

Web Site Traffic Information

Because of the way that Internet communication standards work, when you arrive at or leave the Cards4Ads Web site, we automatically receive the Web address of the site that you came from or are going to. We also collect information on which pages of our Web site you visit while you are on the Cards4Ads site, the type of browser you use and the times you access our Web site. We use this information only to try to understand our customers' preferences better and to manage the load on our servers, so as to improve



our service and your experience with Cards4Ads. We do not track the Web sites that you visit before or after you leave the Cards4Ads site.

Our Use of “Cookies”

“Cookies” are small files of data that reside on your computer and allow us to recognize you as a Cards4Ads customer if you return to the Cards4Ads site using the same computer and browser. We send a “session cookie” to your computer if and when you log in to your Cards4Ads account by entering your phone number. These cookies allow us to recognize you if you visit multiple pages in our site during the same session, so that you don’t need to re-enter login every time. Once you log out or close your browser, these session cookies expire and no longer have any effect.

Customer Service Correspondence

If you send us correspondence, including e-mails and faxes, we retain such information in the records of your account. We will also retain customer service correspondence and other correspondence from Cards4Ads to you. We retain these records in order to measure and improve our customer service, and to investigate potential fraud and violations of our User Agreement. We may, over time, delete these records if permitted by law.

Questionnaires, Surveys and Profile Data

From time to time, we may offer optional questionnaires and surveys to our users for such purposes as collecting demographic information or assessing users’ interests and needs. The use of the information collected will be explained in detail in the survey itself. If we collect personally identifiable information from our users in these questionnaires and surveys, the users will be given notice of how the information will be used prior to their participation in the survey or questionnaire.

Non-member Recipients and Requests

When a member either sends a payment to, or requests a payment from, an individual who is not a registered member of Cards4Ads, we will retain the information that the member submits to us, including, for example, the other party’s phone number and/or name, for the benefit of the member who is attempting to contact the non-member, so that the member can see a complete record of his or her transactions, including uncompleted transactions. Although this information is stored indefinitely, we will not market to the non-member in any way at any time. Additionally, these non-members have the same rights to access and correct information about themselves (assuming that their phone number were correct enough to reach them) as anyone else who uses Cards4Ads.



C. Our Use and Disclosure of Information

Internal Uses

Disclosure to Other Cards4Ads Customers

If you are a registered Cards4Ads user, your name, phone number, date of sign-up, and whether you have verified control of a bank account may be displayed to other Cards4Ads customers whom you have paid or who are attempting to pay you through Cards4Ads. If you are a Business account holder, we will also display to other Cards4Ads customers the Web site address (URL) and customer service contact information that you provide us. However, your credit card number, bank account and other financial information will NEVER be revealed to anyone whom you have paid or who has paid you through Cards4Ads, except with your express permission or if we are required to do so pursuant to a subpoena or other legal process.

If you are buying goods or services and paying through Cards4Ads, the seller of the goods or services may request that you provide a mailing address that Cards4Ads has confirmed as matching the billing address in the credit card system. You do not have to provide this information. If you do not provide the information, however, the seller may choose not to accept your Cards4Ads payment and not to complete the transaction.

We work with third party merchants to enable them to accept payments from you, including direct credit card payments. Merchants who use this service will share personally identifiable information you provide to them with Cards4Ads in order to validate the information, assess the risks of your payment, or confirm the existence or status of your Cards4Ads account. You permit Cards4Ads to share information with the merchant on the validity of the personally identifiable information you provided to the merchant, and on the existence or status of your Cards4Ads account. Cards4Ads does not store the personally identifiable information provided by these merchants to validate the existence of your account.

Disclosure to Third Parties Other Than Cards4Ads Customers

Cards4Ads will not sell or rent any of your personally identifiable information to third parties. Cards4Ads will not share any of your personally identifiable information with third parties except in the limited circumstances described below, or with your express permission (and with other Cards4Ads customers as described above). These third parties are limited by law or by contract from using the information for secondary purposes beyond the purposes for which the information is shared.

1. We share information with companies that help us process the transactions you request and protect our customers' transactions from fraud, such as sharing your credit card number with a service that screens for lost and stolen card numbers. See "Information About You From Third Parties" in Section B above. Additionally, if you go into a negative balance and owe us money, we may share information with processing companies including collection agencies.



2. We may disclose the information we collect, as described in Section B above, to companies that perform marketing services on our behalf. We may also disclose the information we collect (but not your bank account or credit card information) to other financial institutions with whom we have joint marketing agreements, in order to determine whether you are pre-approved for the products that Cards4Ads is jointly marketing with the third party. These companies are subject to confidentiality agreements with us and other legal restrictions that prohibit using the information except to market the specified Cards4Ads-related products or services, unless you have affirmatively agreed or given your prior permission for other uses.
3. We disclose information that we in good faith believe is appropriate to cooperate in investigations of fraud or other illegal activity, or to conduct investigations of violations of our User Agreement. For example, this means that if we conduct a fraud investigation and conclude that one side has engaged in deceptive practices, we can give that person or entity's contact information (but not bank account or credit card information) to victims who request it.
4. We disclose information in response to a subpoena, warrant, court order, levy, attachment, order of a court-appointed receiver or other comparable legal process, including subpoenas from private parties in a civil action.
5. When a user signs up for a co-branded version of Cards4Ads (e.g. Sitename.Cards4Ads.com) through links to Cards4Ads from our co-branded partner's website, Cards4Ads will share with the co-branded partner that user's name, phone number and physical address in order to provide enhanced integration between Cards4Ads's services and the services of our co-branded partner. If you do not want your information shared with Cards4Ads's co-branded partner, you should sign up with Cards4Ads directly and not through a link from our partner's website.
6. We disclose information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you).
7. We share aggregated statistical data with our business partners or for public relations. For example, we may disclose that a specific percentage of our users live in London. However, this aggregated information is not tied to personally identifiable information.
8. As with any other business, it is possible that Cards4Ads in the future could merge with or be acquired by another company. If such an acquisition occurs, the successor company would have access to the information maintained by Cards4Ads, including customer account information, but would continue to be bound by this Privacy Policy unless and until it is amended as described in Section A above.
9. We share your information with our parent, subsidiaries and joint ventures to help coordinate the services we provide to you, enforce our terms and conditions, and promote trust and safety.



Our Contacts with Cards4Ads Customers

We communicate with users on a regular basis via our help desk to provide requested services, and we also communicate by phone to resolve customer complaints or investigate suspicious transactions. We use your phone number to confirm your opening of a Cards4Ads account, to send you notice of payments that you send or receive through Cards4Ads (including referral payments described below), to send information about important changes to our products and services, and to send notices and other disclosures required by law. Generally, users cannot opt out of these communications, but they will be primarily informational in nature rather than promotional. In connection with independent audits of our financial statements and operations, the auditors may seek to contact a sample of our customers to confirm that our records are accurate. However, these auditors cannot use personally identifiable information for any secondary purposes.

Internet Address Information

We use IP addresses, browser types and access times to analyze trends, administer the site, improve site performance and gather broad demographic information for aggregate use.

Your Use of Information and Our Services

In order to facilitate the transactions between Cards4Ads members, our service allows you limited access other users' contact or shipping information. As a seller you may have access to the User ID, phone number and other contact or shipping information of the purchaser, and as a purchaser you may have access to the User ID, phone number and other contact information of the seller.

By entering into our User Agreement, you agree that, with respect to other users' personally identifiable information that you obtain through the site or through an Cards4Ads-related communication or Cards4Ads-facilitated transaction, you will only use this information for: (a) Cards4Ads-related communications that are not unsolicited commercial messages, (b) using services offered through Cards4Ads (e.g. insurance, shipping and fraud complaints), and (c) any other purpose that such user expressly agrees to after adequate disclosure of the purpose(s).

In all cases, you must provide users with the opportunity to remove themselves from your database and review any information you have collected about them. In addition, under no circumstances, except as defined in this Section, can you disclose personally identifiable information about another Cards4Ads user to any third party without our consent and the consent of such other user after adequate disclosure. Note that law enforcement personnel and other rights holders are given different rights with respect to information they access.

Cards4Ads does not tolerate spam. Therefore, without limiting the foregoing, you may not add a Cards4Ads user to your mail list (email or physical mail) without their express consent after adequate disclosure, even if said user has previously made a purchase from you. We strictly enforce our Anti-Spam Policy! To report Cards4Ads-related spam to Cards4Ads, please contact us.



D. Information Security

Information Security

Cards4Ads is committed to handling your customer information with high standards of information security. We restrict access to your personally identifiable information to employees who need to know that information in order to provide products or services to you. We maintain physical, electronic and procedural safeguards that comply with federal regulations to guard your nonpublic personal information. We test our security systems regularly and also contract with outside companies to audit our security systems and processes. The security of your Cards4Ads account also relies on your protection of your Cards4Ads login. You may not share your Cards4Ads login with anyone. Cards4Ads will never ask you to send your login or other sensitive information to us in an e-mail, though we may ask you to enter this type of information on the Cards4Ads website, which will always have a URL beginning with www.Cards4Ads.com.

Any e-mail or other communication requesting your login, asking you to provide sensitive account information via email, or linking to a website with a URL that does not begin with www.Cards4Ads.com should be treated as unauthorized and suspicious and should be reported to Cards4Ads immediately. If you do share your Cards4Ads login with a third party for any reason, including because the third party has promised to provide you additional services such as account aggregation, the third party will have access to your account and your personal information, and you may be responsible for actions taken using your login. If you believe someone else has obtained access to your login, please change it immediately by logging in to your account at www.Cards4Ads.com and changing your Security settings, and also contact us right away as described in Section F below.

E. Accessing and Changing Your Information

You can review the personal information you provided us and make any desired changes to such information, or to the settings for your Cards4Ads account, at any time by logging in to your account on the Cards4Ads Web site and changing your preferences in the Profile area. You can also close your account through the Cards4Ads Web site. If you close your Cards4Ads account, we will mark your account in our database as "Closed," but will keep your account information in our database. This is necessary in order to deter fraud, by ensuring that persons who try to commit fraud will not be able to avoid detection simply by closing their account and opening a new account. However, if you close your account, your personally identifiable information will not be used by us for any further purposes, nor sold or shared with third parties, except as necessary to prevent fraud and assist law enforcement, or as required by law.

F. Contacting Us

If you have any questions about this privacy statement, Cards4Ads's information practices, or your dealings with Cards4Ads, contact us Monday through Friday between the hours of 10am and 6pm CST, or write us at Blakeney Ventures Limited 66 Charlotte Street Charlotte Street, London, England, W1T 4QE.