

Privacy Policy

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1. Introduction

Welcome to **YOOZ!**

MILA Technology Limited (“us”, “we”, or “our”) operates **YOOZ** (hereinafter referred to as the “Service”).

Our Privacy Policy governs your visit to and use of **YOOZ Online** website and payment platform <https://portal.yoozit.today/>, the **YOOZ Mobile** *190# USSD platform and the **YOOZ Payment Gateway**. It explains how we collect, safeguard and disclose information that results from your use of our Service.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our Terms and Conditions.

Our Terms and Conditions (“**Terms**”) govern all use of our Service and together with the Privacy Policy constitutes your agreement with us (“**agreement**”).

2. Definitions

SERVICE means the **YOOZ Online** website and payment platform <https://portal.yoozit.today/>, the **YOOZ Mobile** (*190#) USSD payment platform and the **YOOZ Payment Gateway** all operated by MILA Technology Limited.

PERSONAL DATA is any information about you by which you can be identified or be identifiable. For the purposes of GDPR (General Data Protection Regulation), Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity.

USAGE DATA is data collected automatically either generated by the use of Service or from Service infrastructure itself (for example, the duration of a page visit).

COOKIES are small files that are placed on Your computer, mobile device or any other device by a website, containing the details of Your browsing history on that website among its many uses.

COUNTRY refers to Trinidad and Tobago.

DATA CONTROLLER for the purposes of the GDPR, refers to the Company as the legal entity which alone or jointly with others determines the purposes and means of the processing of Personal Data.

DATA PROCESSORS (OR SERVICE PROVIDERS) are any persons, companies or other bodies who process the data on behalf of the Data Controller (the Company). We may use the services of

various Service Providers in order to process your data more effectively. It refers to third-party companies or individuals employed by the Company to facilitate the Service, to provide the Service on behalf of the Company, to perform services related to the Service or to assist the Company in analyzing how the Service is used. For the purpose of the GDPR, Service Providers are considered Data Processors.

DEVICE means any device that can access the Service such as a computer, a cellphone, or a digital tablet.

DO NOT TRACK (DNT) is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.

THE USER (Or You) is the individual accessing or using our Service. or the company, or other legal entity on behalf of which such individual is accessing or using the Service, as applicable. Under GDPR, You can be referred to as the Data Subject or as the User as you are the individual using the Service.

WEBSITE refers to **YOOZ Online** <https://portal.yoozit.today/> from which the YOOZ Payment Platform and Service can accessed and information on our payment services can be found.

3. Information Collection and Use

We collect several different types of information for various purposes to provide and improve our Service to You. Information may be collected when You register for and / or use our Services, through visits to and use of our website and via third parties (e.g. payment processors; third party marketing services).

4. Types of Data Collected

4.1 Personal Data

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("**Personal Data**"). It also applies to any third parties whose personal data you provide to us in respect of which we are a data controller. You acknowledge that you have informed any third party that their personal data may be collected and processed by YOOZ and made them aware of this Privacy Policy. Personally identifiable information may include, but is not limited to:

- i. **Contact Details** – First and last name; business/residential address; billing address; email address; phone number
- ii. **Payment Details (limited):** cardholder name, issuing bank, card details, amounts and to which service provider or merchant.
- iii. **Transaction Details:** Bill payment amounts; customer account number; customer name and contact details.

- iv. **Transaction History:** details of the transactions (date, time, relevant service provider or merchant and account numbers) carried out when paying through any of our payment services.
- iv. **Correspondence:** any correspondence you choose to send to YOOZ (including complaints); any information you provide to our support team; any information you publish about YOOZ.
- v. **Usage Data and Cookies** (see sections 4.2 and 4.3 for further details)

We may use your Personal Data to contact you via email blasts, SMS, WhatsApp and other third-party direct messaging services used by YOOZ with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by contacting us to remove you from the contact listing.

4.2 Usage Data

Usage Data is collected automatically when using the Service.

When You access the Service with a device, we may automatically collect certain information (“**Usage Data**”), including but not limited to, the type of device You use, Your device unique ID, your device operating system, your Internet Protocol address, the type and version of Internet browser you use, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, and other unique device identifiers, diagnostic data and analytic data.

4.3 Tracking Technologies and Cookies Data

We use Cookies and similar tracking technologies to track the activity on our Service and store certain information. Tracking technologies used are beacons, tags and scripts to collect and track information and to improve and analyze our Service.

The technologies we use may include:

- **Cookies or Browser Cookies.** Cookies are small text files that are placed on Your computer, mobile device or any other device by a website you visit. They help that website provide a unique and tailored user experience by remembering information about your visit, which can both make it easier to visit the site again and make the site more useful to you.

You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Service. Unless you have adjusted Your browser setting so that it will refuse Cookies, our Service may use Cookies.

Visitors to our Website are given the option to manage their Cookie settings when they first visit our site or adjust their settings via our [Opt-Out](#) page.

- **Web Beacons.** Certain sections of our Service and our emails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs)

that permit the Company, for example, to count users who have visited those pages or opened an email and for other related application or website statistics (for example, recording the popularity of a certain section and verifying system and server integrity).

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on Your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close Your web browser.

We use both Session and Persistent Cookies for the purposes set out below:

- **Necessary / Essential Cookies**

Type: Session Cookies

Administered by: Us

Purpose: These Cookies are essential to provide You with services available through the Website and to enable You to use some of its features. They help to authenticate users and prevent fraudulent use of user accounts. They allow us to remember choices You make when You use the Website, such as remembering your LOGIN details or language preference, thus providing a more personal experience without having to re-enter preferences every time you use the Site. They also identify Cookies if You accept the use of the cookies on the site. Without these Cookies, the services that You have asked for cannot be provided, and We only use these Cookies to provide You with those services.

- **Analytics Cookies (Site Performance)**

Type: Persistent Cookies

Administered by: Third-Parties

Purpose: These Cookies are used to monitor site usage behaviour. The information gathered via these Cookies may directly or indirectly identify you as an individual visitor. This is because the information collected is typically linked to a pseudonymous identifier associated with the device you use to access the Website. We may also use these Cookies to test new pages, features or new functionality of the Website to see how our users react to them.

4.4 Other Data

While using our Service, we may also collect the following information: sex, age, date of birth, place of birth, passport details, citizenship, registration at place of residence and actual address, telephone number (work, mobile), details of documents on education, qualification, professional training, employment agreements, NDA agreements, information on bonuses and compensation, information on marital status, family members, social security (or other taxpayer identification) number, office location and other data.

5. Use of Data

The Company uses the collected data for various purposes:

- **To provide and maintain our Service**, including to monitor the usage of our Service.
- **For Security**, for implementation of protocols for compliance, fraud prevention and accounting purposes.
- **Technical Reasons**: to detect, prevent and address technical issues. To also allow you to participate in interactive features of our Service when you choose to do so.

- **To manage Your Account:** to manage Your registration as a user of the Service. The Personal Data You provide can give You access to different functionalities of the Service that are available to You as a registered user.
- **For the performance of a contract:** the development, compliance and undertaking of the contract entered into between You and us for the Service, including for billing and collection.
- **To contact You:** To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- **To provide You** with news/notices, special offers and general information about changes to our Service or information on other goods, services and events which we offer that are similar to those that you already use or enquired about unless You have opted not to receive such information.
- **To manage Your requests and provide support:** To attend and manage Your requests to Us and provide Customer Support.
- **To deliver targeted advertising to You:** We may use Your information to develop and display content and advertising (and work with third-party vendors who do so) tailored to Your interests and/or location and to measure its effectiveness.
- **For business transfers:** We may use Your information to evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of Our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by Us about our Service users is among the assets transferred.
- **For other purposes:** We may use Your information for other purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our Service, products, services, marketing and your experience.

We may share Your personal information in the following situations:

- **With Service Providers:** We may share Your personal information with Service Providers to monitor and analyze the use of our Service, to advertise on third party websites to You after You visited our Service, for payment processing, to contact You.
- **For business transfers:** We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company or Operator assets, financing, or acquisition of all or a portion of Our business to another company.
- **With Affiliates:** We may share Your information with Our affiliates, in which case we will require those affiliates to honour this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- **With business partners:** We may share Your information with Our business partners to offer You certain products, services or promotions.
- **With other users:** when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside.
- **With Your consent:** We may disclose Your personal information for any other purpose with Your consent.

6. Retention of Data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

When Your Personal Data is no longer required by law or rights or obligations by Us or You, We will delete the Personal Data. In most cases, Personal Data will be deleted upon termination or expiry of the agreement between the You and the Company or upon Your written request.

6.5 Delete Your Personal Data

You have the right to delete or request that We assist in deleting the Personal Data that We have collected about You.

Our Service may give You the ability to delete certain information about You from within the Service.

You may update, amend, or delete Your information at any time by signing in to Your Account, if you have one, and visiting the account settings section that allows you to manage Your personal information. You may also contact Us to request access to, correct, or delete any personal information that You have provided to Us.

Please note, however, that We may need to retain certain information when we have a legal obligation or lawful basis to do so.

7. Transfer of Data

Your information, including Personal Data, is processed at the Company's or Operator's operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to – and maintained on – computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those of your jurisdiction.

If you are located outside Trinidad and Tobago and choose to provide information to us, please note that we transfer the data, including Personal Data, to Trinidad and Tobago and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

The Company will take all the steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an

organisation or a country unless there are adequate controls in place including the security of your data and other personal information.

8. Disclosure of Data

We may disclose personal information that we collect, or you provide:

8.1 Disclosure for Law Enforcement.

Under certain circumstances, we may be required to disclose your Personal Data if required to do so by law or in response to valid requests by public authorities. (e.g. a court or a government agency).

8.2 Business Transaction.

If we or our subsidiaries are involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

8.3 Other cases. We may disclose your information also:

- i. to our subsidiaries and affiliates;
- ii. to contractors, service providers, and other third parties we use to support our business; (e.g. third party payment processors, anti-fraud service providers, data and direct marketing service providers)
- iii. to fulfill the purpose for which you provide it;
- iv. if we believe disclosure is necessary or appropriate to protect the rights, property, or safety of the Company, our customers, or others.
- v. to comply with a legal obligation
- vi. to prevent or investigate possible wrongdoing in connection with the Service
- vii. to protect against legal liability
- viii. for any other purpose disclosed by us when you provide the information;
- ix. with your consent in any other cases;

9. Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

10. Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Union (EU) and European Economic Area (EEA), you have certain data protection rights, covered by GDPR.

10.1 - Legal Basis for Processing Personal Data under GDPR

We may process Personal Data under the following conditions:

- **Consent:** You have given Your consent for processing Personal Data for one or more specific purposes.
- **Performance of a contract:** Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- **Legal obligations:** Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- **Vital interests:** Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- **Public interests:** Processing Personal Data is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Company.
- **Legitimate interests:** Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, the Company will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

10.2 - Your Rights under the GDPR

We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please email us at yooz@yoozit.today.

You have the right under this Privacy Policy, and by law if You are within the EU, to:

- **Request access to Your Personal Data.** The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You.
- **Request correction of the Personal Data that We hold about You.** You have the right to have any incomplete or inaccurate information We hold about You corrected.
- **Object to processing of Your Personal Data.** This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular situation, which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.
- **Request erasure of Your Personal Data.** You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- **Request the transfer of Your Personal Data.** We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.

- **Withdraw Your consent.** You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

10.3 - Exercising of Your GDPR Data Protection Rights

Please note that we may ask you to verify your identity before responding to such requests. If You make a request, We will try our best to respond to You as soon as possible. Please note, we may not be able to provide Service without some necessary data.

11. Service Providers

We may employ third party companies and individuals to facilitate our Service (“**Service Providers**”), provide Service on our behalf, perform Service-related services, or assist us in analysing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

12. Analytics

We may use third-party Service Providers to monitor and analyze the use of our Service.

They may include, but are not limited to:

- **Google Analytics**
Google Analytics is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.
You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents the Google Analytics JavaScript (ga.js, analytics.js and dc.js) from sharing information with Google Analytics about visits activity.
You may opt-out of certain Google Analytics features through your mobile device settings, such as your device advertising settings or by following the instructions provided by Google in their Privacy Policy: <https://policies.google.com/privacy>
For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>
- **Matomo**
Matomo is a web analytics service. You can visit their Privacy Policy page here: <https://matomo.org/privacy-policy>
- **Fathom**
Fathom is a web analytics service. You can visit their Privacy Policy page here: <https://www.fathomhq.com/privacy>

13. CI/CD tools

We may use third-party Service Providers to automate the development process of our Service.

14. Behavioral Remarketing

We may use remarketing services to advertise on third party websites to you after you visited our Service. We and Our third-party vendors use cookies and non-cookie technologies to help Us recognize Your Device and understand how You use our Service so that We can improve our Service to reflect Your interests and serve You advertisements that are likely to be of more interest to You.

These third-party vendors collect, store, use, process and transfer information about Your activity on Our Service in accordance with their Privacy Policies and to enable Us to:

- Measure and analyze traffic and browsing activity on Our Service
- Show advertisements for our products and/or services to You on third-party websites or apps
- Measure and analyze the performance of Our advertising campaigns

Some of these third-party vendors may use non-cookie technologies that may not be impacted by browser settings that block cookies. Your browser may not permit You to block such technologies. You can use the following third-party tools to decline the collection and use of information for the purpose of serving You interest-based advertising:

- The NAI's opt-out platform: <http://www.networkadvertising.org/choices/>
- The EDAA's opt-out platform <http://www.youronlinechoices.com/>
- The DAA's opt-out platform: <http://optout.aboutads.info/?c=2&lang=EN>

You may opt-out of all personalized advertising by enabling privacy features on Your mobile device such as Limit Ad Tracking (iOS) and Opt Out of Ads Personalization (Android). See Your mobile device Help system for more information.

We may share information, such as hashed email addresses (if available) or other online identifiers collected on Our Service with these third-party vendors. This allows Our third-party vendors to recognize and deliver You ads across devices and browsers. To read more about the technologies used by these third-party vendors and their cross-device capabilities please refer to the Privacy Policy of each vendor listed below.

The third-party vendors We may use are, but are not limited to:

- **Google Ads (AdWords)**
Google Ads (AdWords) remarketing service is provided by Google Inc.
You can opt-out of Google Analytics for Display Advertising and customise the Google Display Network ads by visiting the Google Ads Settings page:
<http://www.google.com/settings/ads>
Google also recommends installing the Google Analytics Opt-out Browser Add-on - <https://tools.google.com/dlpage/gaoptout> - for your web browser. Google Analytics Opt-out Browser Add-on provides visitors with the ability to prevent their data from being collected and used by Google Analytics.
For more information on the privacy practices of Google, please visit the Google Privacy & Terms web page: <https://policies.google.com/privacy>

- **Twitter**

Twitter remarketing service is provided by Twitter Inc.

You can opt-out from Twitter's interest-based ads by following their instructions:

<https://support.twitter.com/articles/20170405>

You can learn more about the privacy practices and policies of Twitter by visiting their Privacy Policy page: <https://twitter.com/privacy>

- **Facebook / Meta**

Facebook or Meta remarketing service is provided by Facebook Inc. and Meta Inc.

You can learn more about interest-based advertising from Facebook by visiting this page:

<https://www.facebook.com/help/516147308587266>

To opt-out from Facebook's interest-based ads, follow these instructions from Facebook:

<https://www.facebook.com/help/568137493302217>

Facebook adheres to the Self-Regulatory Principles for Online Behavioural Advertising established by the Digital Advertising Alliance. You can also opt-out from Facebook and other participating companies through the Digital Advertising Alliance in the USA

<http://www.aboutads.info/choices/>, the Digital Advertising Alliance of Canada in Canada

<http://youradchoices.ca/> or the European Interactive Digital Advertising Alliance in Europe

<http://www.youronlinechoices.eu/>, or opt-out using your mobile device settings.

For more information on the privacy practices of Facebook, please visit Facebook's Data Policy: <https://www.facebook.com/privacy/explanation>

- **Pinterest**

Pinterest remarketing service is provided by Pinterest Inc.

You can opt-out from Pinterest's interest-based ads by enabling the "Do Not Track" functionality of your web browser or by following Pinterest instructions:

<http://help.pinterest.com/en/articles/personalization-and-data>

You can learn more about the privacy practices and policies of Pinterest by visiting their Privacy Policy page: <https://about.pinterest.com/en/privacy-policy>

15. Usage, Performance and Miscellaneous

We may use third-party Service Providers to provide better improvement of our Service.

To read more about the technologies used by these third-party vendors, please refer to the Privacy Policy of each vendor listed below.

The third-party vendors We may use are, but are not limited to:

- **Invisible reCAPTCHA**

We use an invisible captcha service named reCAPTCHA. reCAPTCHA is operated by Google. The reCAPTCHA service may collect information from You and from Your Device for security purposes.

The information gathered by reCAPTCHA is held in accordance with the Privacy Policy of Google:

<https://www.google.com/intl/en/policies/privacy/>

16. Payments

We may provide paid products and/or services within the Service. In that case, we use third-party services for payment processing (e.g. payment processors).

When performing a transaction, card details are tokenized (i.e. given a unique code) and sent to the cardholder's bank to be de-coded. Only the cardholder's bank has access to the card details. The use of your personal information is governed by their Privacy Policy.

We adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

17. Links to Other Sites

Our Service may contain links to other sites that are not operated by us. If you click a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites or services.

18. Children's Privacy

Our Services are not intended for use by children under the age of 18 ("**Child**" or "**Children**").

We do not knowingly collect personally identifiable information from Children under 18. If you become aware that a Child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from Children without verification of parental consent, we will take steps to remove that information from our servers.

19. Changes to This Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

19. Contact Us

If you have any questions about this Privacy Policy, please contact us by email: yooz@yoozit.today.