

Privacy Notice

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Introduction

Aylo Billing Ltd (hereinafter “we”, “us”, or “our”) operates the website mdh-support.com (hereinafter “**MDH Support Site**”) and is the controller of the information collected or provided via the MDH Support Site.

Please read this Privacy Notice carefully, as your access to and use of MDH Support Site signifies that you have read, understand, and agree to all terms within this Notice. We respect your privacy and are committed to protecting your personal data.

If you have any questions about our privacy practices, please see “Contact Information” below for information on how to contact us.

Scope

For the purposes of this Privacy Notice, “process”, “processed” or “processing” means any operation or set of operations performed on personal data or on sets of personal data (excluding disclosure thereof), whether by automated means, including one or several of the following operations: collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, alignment or combination, restriction, erasure or destruction. Information on disclosure of personal data or of sets of personal data may be found in the section “Disclosure of Your Personal Information” section below.

We collect, process, and retain personal data to the extent necessary to provide users with our service. This Privacy Notice applies to information we collect on MDH Support Site and in e-mail, text and other communications between you and MDH Support Site.

The Data We Collect About You

“Personal data”, or “personal information”, means any information about an individual from which that person can be identified by. It does not include data that has been anonymized or pseudonymized.

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, title, date of birth and gender.
- **Contact Data** includes billing address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased or received from us.
- **Technical Data** includes internet protocol (IP) address.

We may also collect, use and share your data to produce and share aggregated insights that do not identify you. Aggregated data may be derived from your personal data but is not considered personal data as this data does not directly or indirectly reveal your identity.

We do not collect special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, information about your health and genetic and biometric data).

How Is Your Personal Information Collected

- **Direct interactions.** Information that you provide when you contact us for support or by filling in forms on MDH Support Site, in particular at the time of reporting a problem or requesting further services.
- **Automated technologies or interactions.** See “Cookies and Automatic Data Collection Technologies” for details of how we may automatically collect your personal data.
- **Third parties.** We may receive personal data about you from various third parties, for example, other websites controlled by us or members of our corporate group, our business partners or other third parties.

Purposes for Which We Process Your Personal Information

We process personal information for the purposes described below:

- **Provision of services:** to provide you with support in case you need to, for instance to validate items on your credit card or bank statement for SEPA, offer clear and detailed information, which will help you identify purchases of our products easily on your statement in case of issues, confirm transactions in case descriptions on your statements are confusing or do not match a product you have recently purchased.
- **Customer management:** to manage a registered users’ account, to provide customer support and notices to registered users about their account or subscription, including expiration and renewal notices, and notices about changes to the MDH Support Site or any services we offer or provide through it.
- **Functionality and security:** to diagnose or fix technology problems, and to detect, prevent, and respond to actual or potential fraud, illegal activities, or intellectual property infringement.
- **Compliance:** to enforce our Terms & Conditions and to comply with our legal obligations.
- **Information you provide:** in any other way we may describe when you provide the information; or for any other purpose with your consent provided separately from this Privacy Notice.

Our Legal Bases Under Canadian and European Union (EU) Privacy Law

To the extent required by applicable law, we rely on several legal bases to use your data in these ways. This means we process your personal data only where:

- You provide your consent to do so for a specific purpose. You may withdraw your consent at any time with effect for the future. Withdrawing your consent will not affect the

lawfulness of any collection, use, processing, or disclosure that occurred prior to the withdrawal.

- It is necessary to perform our contract with you: for example, to provide our services.
- It is necessary to comply with our legal obligations: for example, we may be required to collect, use or disclose your information in connection with civil, criminal, corporate, taxation, regulatory matters or litigation.
- It satisfies a legitimate interest (which is not overridden by your data protection interests): for example, to keep MDH Support Site safe and secure from fraud and illegal activities.
- It is used to protect your or others' vital interests: for example, in case of emergency or to prevent a crime or fraud.
- It is used for tasks carried out in the public interest: for example, to combat unlawful behaviour where it is in the public interest to do so and where the public interest is laid down by applicable law.

Depending on the circumstances, we may rely on different legal bases when processing your same information for different purposes. If you reside outside the European Economic Area (“EEA”), Switzerland or the United Kingdom (“UK”), the legal bases on which we rely may differ from those listed above.

Disclosure of Your Personal Information

We disclose your personal information when necessary to perform the services or for other purposes set out in this Privacy Notice. When we disclose your personal information, we usually rely on the performance of our contract with you, our legal obligation to do so, our legitimate interest, so long as it doesn't outweigh your interests or your consent, except when expressly stated otherwise below in the paragraph “To comply with the law or protect our rights or the rights of third parties”.

Disclosure of your personal information may also involve transfers of your personal information outside the EEA. To the extent that we need to transfer personal information outside the EEA, we will do so according to the section “Transfers of Your Personal Information to Other Countries” or when necessary for the performance of the contract between us.

The parties to whom we may disclose your personal information include:

- **Our contractors and/or employees:** To provide our services to you, our employees and/or contractors may receive access to your personal data only on a need-to-know basis. Such employees and contractors abide by confidentiality obligations.
- **Our corporate group** We may disclose your personal information to members of our corporate group (that is, entities that control, are controlled by, or are under common control with us) to the extent this is necessary for the purposes described in this Privacy Notice, and generally to operate our business, which includes: identification purposes, transaction monitoring and payment processing, customer support, facilitate business development, administer user accounts or provide IT, technical and engineering support. You acknowledge that in some cases, members of our corporate group might be established or run their services outside the EEA.
- **Service providers:** We disclose certain categories of personal information to our authorized service providers to enable us to provide our services to you pursuant to our Terms & Conditions. These service providers may use your information only to perform these tasks on our behalf, such as document authenticity verification, risk and fraud detection and mitigation, customer service, analytics, security, hosting or supporting MDH

Support Site's functionality. These service providers have limited access to personal information needed to perform their functions and are not permitted to process such information for any other purposes. Where required under applicable laws, we have entered into data processing agreements with such service providers to ensure that personal information is only processed securely within our instructions.

- **Legal successors:** We may disclose all categories of personal information we process to a buyer or other successor in the event of a merger, acquisition or sale or transfer of some or all our assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding. Such transactions may be in our legitimate interest, particularly our interest in making decisions that enable our business to develop.
- **To comply with the law or protect our rights or the rights of third parties:** We access, preserve and share personal information with regulators, public authorities, law enforcement, government agencies, out-of-court dispute settlement bodies or others where we reasonably believe such disclosure is needed to:
 1. comply with any applicable law, regulation, court order, legal process, government or public authority requests.
 2. enforce applicable Terms & Conditions, including prevention of potential violations thereof. This also includes our Trust and Safety initiative, in the scope of which we may disclose some information to several recipients.
 3. detect, prevent, or otherwise address illegal or suspected illegal activities, security, or technical issues.
 4. protect against harm to the rights, property or safety of our company, our users, our employees, or others; or
 5. maintain and protect the security and integrity of MDH Support Site or infrastructure. In such cases, we may raise or waive any legal objection or right available to us, in our sole discretion.

We may disclose your information to third parties for the above purposes where necessary to comply with our legal obligations, to perform a task in the public interest (where the public interest is laid down by applicable law), or under our legitimate interests and the interests of the public, including as part of investigations or regulatory enquiries to detect, investigate and prosecute illegal activity.

Cookies and Automatic Data Collection Technologies

As you navigate through and interact with MDH Support Site, we use cookies to collect certain information about your equipment, such as your IP address.

A cookie is a small piece of data that, when browsing a website, will ask your browser to collect and store on your computer or internet-compatible end user devices for example, smartphones and tablets, in order to remember information about you. The cookies set by us are called first party cookies and are mostly used to improve your user experience by remembering user preferences and settings.

We currently use the following types of cookies:

Essential cookies

These are cookies necessary for the functioning of MDH Support Site and cannot be switched off in our systems as they enable core website functionality. They are used to carry out the transmission of a communication (e.g. load balancing cookies), provide you with the requested

services or are set in response to actions made by you, such as setting your privacy preferences, logging in or filling in forms (UI customization cookies). You can set your browser to block these cookies, but that will cause some parts of MDH Support Site to not work.

Your Choices About Your Personal Information

We strive to provide you with choices regarding the personal information you provide to us. You can choose not to provide us with certain personal information, but that may result in you being unable to use certain features of MDH Support Site because such information may be required for you to ask a question or for us to be able to support you.

California Rights and Choices

As of January 1, 2020, the California Consumer Privacy Act of 2018 (“CCPA”) provides California residents (“**Consumer(s)**”) certain rights with respect to their personal information, as this term is defined under the CCPA. In addition to the rights that we state under this Privacy Notice, and subject to the exceptions found under the CCPA, Consumers have the right to:

- Opt-out of the sale of their personal information, should we sell their personal information;
- Be informed of certain information concerning our collection and use of their personal information;
- Request that we delete certain personal information we collected from them;
- Appoint an agent to exercise their rights provided for by the CCPA, provided that a duly executed notarized power of attorney is presented and provided that the agent has information deemed sufficient to allow us to verify the identity of the Consumer in question and to locate his/her information in our systems;
- Not be subjected to discrimination for the exercise of these rights. We will not deny California residents the use of our service, neither will we provide a different level or quality or services for exercising any of their CCPA rights, unless as permitted under the CCPA.

MDH Support Site does not sell, nor has it sold in the past twelve (12) months personal information to third parties for monetary or other valuable consideration. We may however disclose certain personal information to third parties, service providers and entities within our corporate group to enable them to perform certain services on our behalf and namely to make MDH Support Site function properly, as further described in the section titled “Disclosure of Your Personal Information”.

Regardless, we respect the California residents’ right to exclude personal information from such sharing arrangements and to thereby opt-out of any future sale of their personal information. If you are a Registered User and the CCPA is applicable to you and you would like to exercise your rights, please use the buttons at the bottom of this page or email us at mail@mdh-support.com with the email subject line “CCPA Request”.

In either case you will need to provide any information which we may reasonably request for us to verify your identity and enable us to locate your information in our systems.

You can designate an agent to make a request by executing a notarized power of attorney to have that person act on your behalf and providing that person with the information listed above that allows us to verify your identity and locate your information. Alternatively, you will need to directly confirm your identity with us using the methods described above, sign an authorization for the agent to act on your behalf and provide us with confirmation that you have done so.

Resident’s Rights – Jurisdictions in the United States, Where Applicable

We do not sell, trade, or exchange the users’ personal information with anyone for money.

Transfers of Your Personal Information to Other Countries

We share the information we collect globally, both across our corporate group and data centres, and externally with our service providers and other third parties. Transfers are necessary for a variety of reasons, including our operation and provision of the services stated in our Terms & Conditions and this Notice or so that we can fix, analyse and improve our products. Whenever we transfer personal information to countries outside the EEA and other regions with comprehensive data protection laws, we will ensure that the information is transferred in accordance with this Notice, as permitted by the applicable laws and based on appropriate mechanisms.

Where available, we rely on decisions of the European Commission, known as “adequacy decisions,” recognising that certain countries offer a level of protection of personal data that is essentially equivalent to the EEA.

In other situations, we rely on standard contractual clauses approved by the European Commission (and the equivalent standard contractual clauses for the UK, where appropriate) or on derogations provided for under the applicable law to transfer information to a third country. For more information or to obtain a copy of our standard contractual clauses, please see the section “Contact Information” below on how to contact us.

Retention of Personal Information

We will only retain your personal information for as long as your account is active, or for as long as necessary to fulfil the purposes we processed it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider several factors, including what personal data we are processing, the risk of harm from any unauthorised disclosure, why we are processing your personal data and whether we can achieve this outcome by another means without having to process it.

Where we no longer need to process your personal information for the purposes set out in this Privacy Notice, we will delete your personal information from our systems. For more information on data retention periods, please contact us by using the information in the section “Contact Information” below. Where permissible, we will also delete your personal information upon your request as explained in the section “Your Rights Related to Your Personal Information”.

Security of Your Personal Information

We take appropriate security measures (including physical, electronic, and procedural measures) to safeguard your personal information from unauthorized access and disclosure. For example, only authorized employees are permitted to access personal information, and they may do so only for permitted business functions. In addition, we use encryption in the transmission of your personal information between your system and ours, and we use firewalls to help prevent unauthorized persons from gaining access to your personal information. Please note, however, that we cannot fully eliminate security risks associated with the storage and transmission of personal data. We are not responsible for circumventions of any privacy settings or security measures contained on MDH Support Site.

Third-Party Links and Sites

If you click on a link to a third-party website, you will be taken to websites we do not control. This Privacy Notice does not apply to the privacy practices of these websites. Read the Privacy Notice of other websites carefully. We are not responsible for these third-party practices.

Your Rights Related to Your Personal Data

Subject to local law and applicable legal requirements and exemptions, you have certain rights regarding your personal data:

- **Right of Access:** you have the right to receive information on the personal data we hold about you and how such personal data is used;
- **Right to Rectification:** you have the right to rectify inaccurate personal data concerning you;
- **Right to be Forgotten:** you have the right to delete/erase your personal data;
- **Right to data portability:** you have the right to receive the personal data provided by you in a structured, commonly used and machine-readable format and to transmit this personal data to another data controller;
- **Right to Object:** you have the right to object to the use of your personal data where such use is based on our legitimate interests or on public interests;
- **Right to Restriction of Processing:** you have the right in some cases, to restrict our use of your personal data.
- **Right to File a Complaint:** If you are located in the EEA, you also have a right to lodge a complaint with your local data protection authority.

If we ask for your consent to process your personal data, you have the right to withdraw your consent at any time. Note that, in that case, you may no longer be able to use several functionalities of MDH Support Site.

You may, at any time, send us an e-mail at mail@mdh-support.com to exercise your above rights in accordance with the applicable legal requirements and limitations. Please note that we have one (1) month to respond to your request.

Prior to processing a request, we may need to verify your identity. This is an appropriate and reasonable security measure to ensure that personal data is not disclosed to any person who has no right to receive it or deleted in an unauthorized way.

Changes to our Privacy Notice

We may modify or revise our Privacy Notice from time to time. Although we may attempt to notify you when major changes are made to this Privacy Notice, you are expected to periodically review the most up-to-date version found on the MDH Support Site, so you are aware of any changes, as they are binding on you.

If we change anything in our Privacy Notice, the date of change will be reflected in the “last modified date”. You agree that you will periodically review this Privacy Notice and note the date of its last review.

Our Policy Towards Minors

MDH Support Site is forbidden for access to persons under the age of 18 and the applicable age of majority in the jurisdiction from which MDH Support Site is accessed (“**minors**”), and we therefore prohibit minors from using MDH Support Site. We do not knowingly process personal information from minors.

If you are the parent or legal guardian of a minor who has provided us with personal information, then please contact us at mail@mdh-support.com to have that minor's personal information deleted. If we become aware that a minor has provided us with personal information, we take steps to delete such information.

Contact Information

If you have any questions about this Privacy Notice or our information-handling practices, please contact us at mail@mdh-support.com.

You may also contact us at 195-197 Old Nicosia-Limassol Road, Block 1 Dali Industrial Zone, Cyprus 2540, Phone: +357 22662 320, Fax: +357 22343 282.