



GLOBAL PRIVACY POLICY

SEPTEMBER 2026



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1. INTRODUCTION

Praxell Inc. DBA Juice Financial This Privacy Policy for Praxell Inc. DBA Juice Financial ("we," "us," or "our"), describes how and why we access, collect, store, use, and/or share ("process") your personal information when you use our products and/or services ("Services"), including when you:

Visit our website at <https://juicefin.com> or any website of ours that links to this Privacy Policy; Download and use our mobile application operated under the name 'Juice Financial'; Engage with us in other related ways; and When your personal information is processed by us on behalf of our business customers (financial institutions, merchants, insurance companies, and other entities, collectively "Customers") in our capacity as a data processor.

Accessibility: Special assistance is available for persons with disabilities. If you need assistance accessing our Services, please email us at DPO@juicefin.com or call us at 855-687-2114.

All persons interacting with us or whose data we process are referred to as "User," "you," or "your."

Juice Financial is headquartered in New York, NY, United States and provides Services to users and business partners in the United States and internationally. Juice Financial is a financial technology company that processes insurance-related payments on behalf of its Customers to consumers worldwide. In this capacity, Juice generally acts as a data processor (or service provider) on behalf of its Customers, who remain the data controllers (or businesses) responsible for determining the purposes and means of processing. This Privacy Policy describes how Juice handles personal information both when acting as a processor on behalf of Customers and when acting as a controller for data collected directly through its own website and services. However, if you have a request regarding your data which Juice Financial processes as a data processor for its Customers, you should contact the applicable Customers with whom you have a relationship.

Your personal information will be transferred, stored, or processed in the US or other countries where Juice Financial or our service providers operate. When transferring personal information internationally, Juice Financial implements appropriate safeguards consistent with applicable law, which may include contractual protections, information security controls, adequacy decisions, and compliance assessments of service providers.

Juice Financial is a financial technology company, not a bank. Banking services are provided by our Sponsor Bank, pursuant to a license from Mastercard International. Juice Financial is subject to the Gramm-Leach-Bliley Act (GLBA) in the United States with respect to certain financial data it processes.

Questions or concerns? Reading this Privacy Policy will help you understand your privacy rights and choices. If you do not agree with our policies and practices, please do not use our Services. If you still have any questions or concerns, please contact us at DPO@juicefin.com.

2. SUMMARY OF KEY POINTS

What personal information do we process? When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us, the choices you make, and the products and features you use. We use the term "personal information" -- also called "personal data" or "personally identifiable information" in the laws of some jurisdictions -- to refer to information that reasonably identifies, relates to, describes, or can be associated with you. Learn more in Section 3.



Do we process any sensitive personal information? Some information may be considered “special” or “sensitive” in certain jurisdictions, for example your financial data or government identifiers. Learn more in Section 3.

Do we collect any information from third parties? We may collect information from public databases, business partners, identity verification services, and other outside sources. Learn more in Section 3.

How do we process your information? We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with applicable laws. We process your information only when we have a valid legal reason to do so. Learn more in Section 4.

In what situations and with which parties do we share personal information? We may share information in specific situations and with specific third parties. Learn more in Section 5.

What are your rights? Depending on where you are geographically, the applicable privacy law may grant you rights regarding your personal information. Learn more in Section 13, Section 14, and Part II of this Notice.

How do you exercise your rights? The easiest way is by submitting a request to our Data Protection Officer by emailing DPO@juicefin.com or by calling 855-687-2114.

3. WHAT INFORMATION DO WE COLLECT?

- 3.1 PERSONAL INFORMATION YOU DISCLOSE TO US - We collect personal information that you voluntarily provide when you express an interest in obtaining information about us or our products and Services, when you participate in activities on the Services, or otherwise when you contact us. All personal information that you provide must be true, complete, and accurate and you must notify us of any changes to such personal information. Failure to provide us with the necessary data will result in Juice not being able to offer you a product or service.

Personal Information Provided by You. The personal information we collect may include: Identifiers (contact details such as real name, alias, postal address, telephone or mobile contact number, unique personal identifier, online identifier, IP address, email address, and account name); Personal Information (name, contact information, education, employment history, and financial information); Protected classification characteristics under state or federal law (gender, age, date of birth, national origin, marital status, and other demographic data); Commercial Information (transaction information, purchase history, financial details, and payment information); Internet or other similar network activity (browsing history, search history, online behavior, interest data, and interactions with websites, applications, systems, and advertisements); Geolocation data (device location); Audio, electronic, sensory, or similar information (images and audio, video or call recordings created in connection with our business activities); Professional or employment-related information (business contact details, job title, work history, and professional qualifications); Inferences drawn from collected personal information; Sensitive personal Information (citizenship or immigration status, debit or credit card numbers, financial information, national origin, government issued identification document images and social security numbers); Transaction information (cardholder numbers or truncated or tokenized cardholder numbers, cardholder names, transaction amounts, merchant account identification (MID) information, card authorizations, settlement records, chargeback records, AFT (pull), OCT (push) payment transaction records).

Note: When processing payment card data on behalf of our Customers, we maintain PCI DSS compliance and process such data in accordance with payment card industry security standards.



We collect sensitive personal information, including Social Security numbers, government-issued identification numbers, and financial account details, solely for the purpose of facilitating payment processing, identity verification, and compliance with anti-money laundering and know-your-customer regulations, as permitted by applicable law or with your prior consent. You can withdraw your consent at any time by contacting us at DPO@juicefin.com. We will also only use your sensitive personal information in accordance with the consent you have given or for certain permitted purposes to the extent permitted or exempt under applicable law. Sensitive personal information may be used, or disclosed to a service provider or contractor, for additional, specified purposes. You may have the right to limit the use or disclosure of your sensitive personal information. We do not collect or process sensitive personal information for the purpose of inferring characteristics about you.

We may also collect other personal information outside of these categories through instances where you interact with us in person, online, or by phone or mail in the context of: Receiving help through our customer support channels; Participation in customer surveys or contests; Facilitation in the delivery of our Services and to respond to your inquiries.

We will use and retain the collected personal information as needed to provide the Services or for as long as the user has an account with us, and thereafter as required by applicable record retention laws.

Information of Your Customers. Depending on how you, as a business partner, intend to utilize the Services, you may provide us with personal information relating to your customers or contacts. It is incumbent upon you to verify compliance with all applicable laws relating to the collection and/or processing of that data, including obtaining any and all necessary consents.

- 3.2 APPLICATION DATA - If you use our Services, we may also collect: Geolocation Information. We may request access to track location-based information from your mobile device to provide certain location-based services. You may change our access in your device's settings. Device Data. We automatically collect device information (mobile device ID, operating system, version information, system configuration, device and application identification numbers, browser type and version, hardware model, ISP/mobile carrier, and IP address).

This information is primarily needed to maintain the security and operations of our app and/or website(s), for troubleshooting, and for our internal analytics and reporting purposes.

- 3.3 INFORMATION AUTOMATICALLY COLLECTED - Some information, such as your IP address and/or browser and device characteristics, is collected automatically when you visit our Services.

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity but may include device and usage information such as your IP address, browser and device characteristics, operating system, language preferences, referring URLs, device name, country, location, information about how and when you use our Services, and other technical information.

The information we collect includes: Log and Usage Data (service-related diagnostic, usage, and performance information); Device Data (computer, phone, tablet, or other device information); Location Data (non-precise information about your device's location); Cookie Data (Strictly Necessary Cookies, Performance Cookies, Functional Cookies, and Targeting Cookies; see Section 6); Language Preferences (information regarding your preferred language).

- 3.4 INFORMATION COLLECTED FROM OTHER SOURCES - We may collect limited data from public databases, business and marketing partners, and other outside sources.



We may obtain information from other sources, such as public databases (i.e. the United Nations Sanctions List), business partners, joint marketing partners, affiliate programs, identity verification services, fraud prevention databases, and other third parties.

4. HOW DO WE PROCESS YOUR INFORMATION?

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law.

How and Why We Use Your Information: To deliver Services (we process your information to provide you with the requested service); To respond to inquiries/offer support (we process your information to respond to your inquiries and solve any potential issues); To fulfil and manage orders (we process your information to fulfil and manage orders, payments, returns and exchanges); To evaluate and improve Services (we process your information to identify usage trends and improve our Services, products, marketing, and your experience); To comply with legal obligations (we process your information to comply with our legal obligations, including compliance with anti-money laundering ("AML"), bookkeeping laws and rules issued by our designated banks and relevant card networks, and know-your-customer ("KYC") requirements); For security and fraud prevention (we process your information to detect, prevent, and respond to fraudulent, harmful, unauthorized, or illegal activity).

Legal Grounds for Processing. Juice Financial processes personal information based on one or more of the following legal grounds, as permitted by applicable law: Performance of a contract or provision of requested services (i.e. to provide you a product or service); Compliance with legal or regulatory obligations (i.e. to verify your identity); Legitimate interests, including fraud prevention, security, and compliance monitoring (i.e. to comply with AML regulations); Consent, where required by law (i.e. when you ask us to share your data, to provide communications to you); Protection of vital interests or public interest, where applicable (i.e. to respond to law enforcement requests).

Data Processor Role. When Juice Financial acts as a data processor or service provider on behalf of our Customers, we process personal information strictly in accordance with our Customers' instructions and applicable data processing agreements. Juice does not determine the purposes of processing for data received from Customers. Individuals whose data is processed in this capacity should direct their privacy inquiries to the relevant Customer (the controller/business) with whom they interact. Juice will assist the controller in responding to such requests as required by applicable law and contract.

5. WHEN AND WITH WHOM DO WE SHARE YOUR PERSONAL INFORMATION?

We may share information in specific situations described in this section and/or with the following third parties.

Vendors, Consultants, and Other Third-Party Service Providers. We may share your data with third-party vendors, service providers, contractors, or agents who perform Services for us or on our behalf. We have contracts in place designed to safeguard your personal information. They will also not share your personal information with any organization apart from us.

The categories of third parties we may share personal information with include: Anti-money laundering (AML), Know-your-customer (KYC) and Client Identification (CIP) Platforms; Cloud Computing Services; Communication & Collaboration Tools; Data Analytics Services; Data Storage Service Providers; Government Entities; Order Fulfillment Service Providers; Payment Processors and Payment Networks; Performance Monitoring Tools; Product Engineering & Design Tools; User Account Registration & Authentication Services;



Website Hosting Service Providers; Artificial Intelligence Service Providers; Identity Verification and Fraud Prevention Agencies.

5.1 SITUATIONS WHERE WE MAY SHARE YOUR PERSONAL INFORMATION - Business Transfers. In connection with any merger, sale of company assets, financing, or acquisition. Affiliates. With our affiliates, who must honor this Privacy Policy. Business Partners. With our business partners to offer you certain products, services, or promotions. Financial Institutions. With financial institutions (such as our Sponsor Bank) to jointly offer a Service. Payment Networks and Processors. With Mastercard International and other payment networks and processors to facilitate payment processing. Fraud Prevention and Identity Verification Agencies. With fraud prevention and identity verification entities to assist in detecting fraud.

When you are no longer a user of our Services, we continue to share your information as described in this Privacy Policy, to the extent permitted by applicable law and consistent with our legal and regulatory obligations.

6. DO WE USE COOKIES AND OTHER TRACKING TECHNOLOGIES?

We may use cookies and other tracking technologies to collect and store your information.

We may use cookies and similar tracking technologies (like web beacons and pixels) to gather information when you interact with our Services. Some online tracking technologies help us maintain the security of our Services, prevent crashes, fix bugs, save your preferences, and assist with basic site functions.

Juice Financial does not engage in targeted advertising using personal information collected through its payment processing services.

Global Privacy Control: We recognize and honor Global Privacy Control (GPC) signals when required by applicable law. If you use a browser or extension that supports GPC, we will treat this as a valid request to opt out of the sale or sharing of your personal information for targeted advertising purposes under applicable state privacy laws if we engage in such activities.

Google Analytics. We may share your information with Google Analytics to track and analyze the use of the Services. To opt out, visit <https://tools.google.com/dlpage/gaoptout>.

7. DO WE OFFER ARTIFICIAL INTELLIGENCE-BASED PRODUCTS?

We offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies.

As part of our Services, we offer products powered by AI, machine learning, or similar technologies ("AI Products"). These are designed to enhance your experience. We provide AI Products through third-party service providers ("AI Service Providers"), including OpenAI. Your input, output, and personal information will be shared with and processed by these AI Service Providers. Our AI Products are designed for AI bots and AI translation.

All personal information processed using our AI Products is handled in line with this Privacy Policy.

8. HOW LONG DO WE RETAIN YOUR INFORMATION?

We keep your information for as long as necessary to fulfill the purposes outlined in this Privacy Policy unless otherwise required by law.



We will only keep your personal information for as long as it is necessary for the purposes for which it was collected and consistent with applicable law. In the United States, Bank Secrecy Act (BSA) and Anti-Money Laundering (AML) record-keeping requirements generally require retention for a minimum of five (5) years following termination of the customer relationship. Other jurisdictions may impose different retention periods. When we have no ongoing legitimate business need to process your personal information, we will either delete or anonymize such information, or, if this is not possible, we will securely store it and isolate it from further processing until deletion is possible.

9. HOW DO WE KEEP YOUR INFORMATION SAFE?

We aim to protect your personal information through a system of organizational and technical security measures.

We have implemented appropriate and reasonable technical and organizational security measures designed to protect the security of any personal information we process, including encryption of sensitive data in transit and at rest, access controls, and regular security assessments. We maintain PCI DSS compliance when processing payment card data on behalf of our business partners. However, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure. You should only access the Services within a secure environment.

10. SECURITY INCIDENT NOTIFICATION

We maintain administrative, technical, and physical safeguards to protect personal information. If we become aware of a security incident involving personal information that is required to be reported under applicable law, we will provide notice to affected individuals and/or to the competent supervisory authority within the timeframes prescribed by applicable law. Where required, our notice may include a general description of the incident, the categories of personal information involved, steps taken to investigate and mitigate, and guidance on protective steps. We may delay notification where permitted by applicable law.

11. DO WE COLLECT INFORMATION FROM MINORS?

We do not knowingly collect data from or market to children.

We do not knowingly permit minors to create accounts or use the Services directly. However, in the ordinary course of business, we may process personal information about minors (for example, where a minor is a beneficiary under an insurance policy) only to the extent necessary to provide our Services. When we process a minor's personal information, we do so in accordance with applicable law and with appropriate safeguards which includes obtaining the necessary parental or guardian consents required by law. If we learn that personal information from children has been collected without appropriate consent, we will take reasonable measures to promptly delete such data.

12. INTERNATIONAL DATA TRANSFERS

Your personal information may be transferred to, stored in, and processed in countries other than your own.

Juice Financial is headquartered in the United States. Your personal information may be transferred to and processed in the US or other countries where Juice Financial or our service providers operate, which may not offer the same level of data protection as your home country.

When transferring personal information internationally, Juice Financial implements appropriate safeguards, to comply with local laws which may include: Standard Contractual Clauses (SCCs) approved by the



European Commission or equivalent clauses approved by other authorities; Adequacy decisions where the destination country has been deemed to provide adequate protection; Binding Corporate Rules where applicable; Consent of the data subject, where required and obtained; Contractual necessity where the transfer is necessary for the performance of a contract; and Other mechanisms as may be required or permitted under applicable law.

UK International Data Transfer Agreement (IDTA) or UK Addendum to the EU SCCs. Where applicable, these mechanisms may be used for transfers from the United Kingdom.

For jurisdiction-specific transfer mechanisms, please refer to the applicable addendum in Part II.

13. WHAT ARE YOUR PRIVACY RIGHTS?

You may review, change, or terminate your personal information and account at any time, depending on your country, province, or state of residence.

Withdrawing your consent: If we are relying on your consent to process your personal information, you have the right to withdraw your consent at any time by contacting DPO@juicefin.com. This will not affect the lawfulness of processing before withdrawal.

Opting out of marketing: You can unsubscribe from marketing communications at any time by clicking the unsubscribe link, texting "STOP," or contacting DPO@juicefin.com. No mobile information will be shared with third parties for marketing purposes. Information sharing to subcontractors in support services, such as customer service, is permitted.

Cookies and similar technologies: Most Web browsers are set to accept cookies by default. You can choose to set your browser to remove or reject cookies.

General rights: Right to know whether we are processing your data; Right to access your personal information in a readable format; Right to correct inaccuracies; Right to request deletion; Right to non-discrimination for exercising your rights; Right to opt out of targeted advertising, sale of personal information, or profiling; Right to limit the use of your sensitive personal information; Right to object and restrict processing; Right to withdraw consent; Right to lodge a complaint with your local supervisory authority.

How to Exercise Your Rights: Contact us by calling 855-687-2114 or emailing DPO@juicefin.com. Under certain laws, you can designate an authorized agent to make requests on your behalf.

14. ARE THERE JURISDICTION SPECIFIC PRIVACY RIGHTS?

If you are a resident of California, Colorado, Connecticut, Delaware, Indiana, Iowa, Kentucky, Maryland, Minnesota, Montana, Nebraska, New Hampshire, New Jersey, Oregon, Rhode Island, Tennessee, Texas, Utah, Virginia or another U.S. state that has similar comprehensive privacy legislation (collectively, "Covered States"), you may have specific rights regarding your personal information under the California Consumer Privacy Act ("CCPA"), Colorado Privacy Act, Connecticut Data Privacy Act, Delaware Personal Data Privacy Act, Indiana Consumer Data Protection Act, Iowa Consumer Data Protection Act, Kentucky Consumer Data Protection Act, Maryland Online Data Privacy Act, Minnesota Consumer Data Privacy Act, Montana Consumer Data Privacy Act, Nebraska Data Privacy Act, New Hampshire Data Privacy Act, New Jersey Data Privacy Act, Oregon Consumer Privacy Act, Rhode Island Data Transparency and Privacy Protection Act, Tennessee Information Protection Act, Texas Data Privacy and Security Act, Utah Consumer Privacy Act, Virginia Consumer Data Protection Act and similar laws in other U.S. states (collectively, "State Privacy Laws"). This section describes the rights that consumers of Covered States have and explains how to



exercise those rights. To be clear, these rights are granted only to the extent that you are considered a consumer of Covered State and we are acting as a “controller” or “business” (as applicable) under State Privacy Laws with respect to your personal information. Further, these rights may not apply to the extent that Juice Financial and/or the personal information we process as a controller/business is subject to the GLBA, as discussed below.

Additional Rights (under applicable US state privacy laws): Right to Know/Access; Right to Delete; Right to Correct; Right to opt out of sale/sharing/targeted advertising; Right to limit use of sensitive personal information; Right to data portability; Right to nondiscrimination; Right to appeal.

Sale/Sharing Disclosure: We have not sold personal information to third parties for monetary consideration and do not engage in targeted advertising using personal information collected through our payment processing services. To the extent any online identifiers or other personal information are deemed a “sale” or “sharing” under State Privacy Laws, you can opt out via GPC or by contacting us.

California “Shine The Light” Law: In addition to the above rights, under California Civil Code Section 1798.83 (“Shine the Light”), California residents may have the right to request in writing from businesses with whom they have an established business relationship: (a) a list of the categories of personal information, as defined under Shine the Light, such as name, email address, and mailing address, and the type of services provided to the customer that a business has disclosed to third parties (including affiliates that are separate legal entities) during the immediately preceding calendar year for the third parties’ direct marketing purposes; and (b) the names and addresses of all such third parties. To request the above information, please contact us by email at DPO@juicefin.com. If you do not want your personal information shared with any third party who may use such information for direct marketing purposes, then you may opt out of such disclosures by sending an email to us at DPO@juicefin.com.

Gramm-Leach-Bliley Act (GLBA) Exemption: Juice Financial is subject to the Gramm-Leach-Bliley Act (GLBA) as a financial institution. To the extent that personal information is collected, processed, or maintained subject to the GLBA and its implementing regulations (including Regulation P), such information may be exempt from the requirements of certain U.S. state comprehensive consumer privacy laws, including but not limited to the California Consumer Privacy Act, the Virginia Consumer Data Protection Act, the Colorado Privacy Act, the Connecticut Data Privacy Act, and similar state privacy laws that provide GLBA exemptions. This exemption applies only to GLBA-regulated financial data; any personal information that Juice collects or processes outside the scope of the GLBA remains subject to applicable state privacy laws. Juice does not sell personal information and does not use personal information collected through its services for targeted advertising purposes.

15 UPDATES TO THIS IC

We may update this Privacy Policy from time to time, provided that any such modifications will only be applied prospectively. We encourage you to periodically review the Website for the latest information on our privacy practices. The updated version will be indicated by an updated “Last Updated” date. If we make material changes, we may notify you by prominently posting a notice or by directly sending you a notification.

16 LINKS TO THIRD PARTY SITES

Our Services may contain links to third-party websites. Juice has no control over the privacy practices of these websites. You should check the applicable third-party privacy policy when visiting other websites.



17. SMS NOTIFICATIONS

The opt-in information for SMS notifications is solely used to send you SMS messages when you text us a command to 42537. All text messaging originator opt-in data and consent will not be shared with any third parties.

18. CONTACT INFORMATION

You may contact us as follows:

- 18.1 CONTACT OUR DATA PROTECTION OFFICER (DPO) - Email: DPO@juicefin.com. Phone: 855-687-2114. Mail: Juice Financial, Data Protection Officer, P.O. Box 315, New York, NY 10018, United States.

19. ADDENDUM A: RESIDENTS OF ARGENTINA, ARUBA, BRAZIL, THE EUROPEAN UNION / EEA, INDONESIA, NIGERIA, NORWAY, SWITZERLAND, SOUTH AFRICA, UNITED ARAB EMIRATES AND UNITED KINGDOM

Applicable To: Individuals residing in Argentina, Aruba, Brazil, EU/EEA member states, Indonesia, Nigeria, Norway, Switzerland, South Africa, United Arab Emirates, United Kingdom.

Data Controller: Praxell Inc. dba Juice Financial. Where Juice Financial acts as a data controller, for example, when it collects personal information directly from individuals through its website or in connection with its own business operations, Juice Financial is responsible for compliance with applicable data protection laws, including the GDPR and UK GDPR.

- 19.1 LEGAL BASES FOR PROCESSING - For special category data (e.g., sensitive personal information), we rely on: explicit consent, establishment/exercise/defense of legal claims, or substantial public interest.

Juice processes sensitive personal information, including government-issued identification numbers, solely for the purposes of identity verification, payment processing, and compliance with legal obligations. The legal basis for processing such data is that it is necessary for reasons of substantial public interest (compliance with financial regulations) or for the establishment, exercise, or defense of legal claims, or where the data subject has given explicit consent.

- 19.2 DATA SUBJECT RIGHTS UNDER GDPR - Access to and obtain a copy of your personal information by the controller; Rectification of incomplete or outdated personal information; Erasure/"Right to be Forgotten" (you may request erasure of your personal information; this right is not absolute since we may be requested by law to keep your record on file); Restriction of Processing (you have the right to restrict processing of your personal information in defined circumstances, including where the accuracy of the data is contested, where the processing is unlawful, where the data is no longer needed, or where the legitimate grounds for processing by the controller are contested); Data Portability (where processing is justified on the basis of consent or contract, you have the right to receive or have transmitted to another controller all personal information in a structured, commonly used and machine-readable format); Object to Processing (data subjects have the right to object to processing on the legal basis of legitimate interests or public interest, and enjoy an unconditional right to object to processing for direct marketing purposes at any time); Not Be Subject To Solely Automated Decision-Making (we may use automated tools for fraud prevention, AML/KYC compliance, and identity verification; you have the right to obtain human intervention, express your point of view, and contest such decisions); Review of Fully Automated Decisions We Made (this right is not absolute; we may deny if the processing is necessary to perform a contract with you,



authorized by law or based on your explicit consent); Withdraw consent at any time (we will respond within one (1) month, extendable by two (2) months for complex requests); Right to lodge a complaint with the local supervisory authority.

Residents of Argentina have the right to lodge a complaint with the Agencia de Acceso a la Informacion Publica (AAIP). Address: Av. Pte. Gral. Julio A. Roca 710, Piso 2, Buenos Aires. Web: <https://www.argentina.gob.ar/aaip>

Residents of Brazil have the right to lodge a complaint with the Autoridade Nacional de Protecao de Dados (ANPD). Web: <https://www.gov.br/anpd>

Residents of Switzerland have the right to lodge a complaint with the Federal Data Protection and Information Commissioner (FDPIC), Feldeggweg 1, CH-3003 Bern. Web: <https://www.edoeb.admin.ch>

Residents of South Africa have the right to lodge a complaint with the Information Regulator (South African Regulator), JD House, 27 Stiemens Street, Braamfontein, Johannesburg, 2001. Email: infoereg@justice.gov.za or complaints.IR@justice.gov.za

Residents of the UK have the right to lodge a complaint with the UK Supervisory Authority the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Tel: +44 (0)303 123 1113. Web: <https://ico.org.uk>

Data Retention: We retain your data for the duration of the relationship and for a minimum of five (5) years post-termination. Retention periods may vary by jurisdiction. Under EU and UK law, personal information will not be retained longer than necessary for the purposes for which it was collected. In certain cases, regulatory requirements (such as anti-money laundering rules) may require longer retention periods.

20. ADDENDUM B: COLOMBIA

Applicable To: Individuals residing in or located within Colombia.

Under Colombian law (Ley 1581 de 2012 and Decreto 1377 de 2013), Juice Financial processes personal information based on the prior, express, and informed authorization of the data subject, unless an exception under Colombian law applies (such as processing required by law or for a contractual obligation). Juice Financial collects and processes sensitive personal information, including government-issued identification numbers and financial information, only with the express authorization of the data subject and solely for purposes directly related to payment processing, identity verification, and legal compliance. Data subjects may revoke their authorization at any time by contacting DPO@juicefin.com.

Data Subject Rights: In addition to the rights set forth in our Global Privacy Policy, Colombian residents also have the following rights: Right to access personal information (Consulta); Right to update, rectify, or correct personal information (Actualizacion y Rectificacion); Right to request deletion when not required by law (Supresion); Right to revoke authorization; Right to request proof of authorization; Right to file complaints with the Superintendencia de Industria y Comercio (SIC). Contact: Carrera 13 No. 27-00, Bogota, D.C., Colombia; Phone: +57 (601) 587 00 00; Web: <https://www.sic.gov.co>

International Transfers: Personal information may be transferred to countries that do not provide an adequate level of data protection as determined by the SIC. In such cases, Juice will obtain the data subject's authorization for the transfer or rely on applicable legal exceptions under Ley 1581 de 2012.



21. ADDENDUM C: CHINA

Applicable To: Individuals residing in Mainland China (excluding Hong Kong, Macao, and Taiwan).

Under the Personal Information Protection Law (PIPL), Juice Financial processes personal information based on one or more of the following legal bases: (a) the individual's informed consent; (b) necessity for concluding or performing a contract to which the individual is a party; (c) necessity for performing statutory duties or obligations; (d) necessity for responding to public health emergencies or protecting the life, health, or property safety of individuals in emergencies; or (e) other circumstances provided by laws or administrative regulations.

Sensitive Personal Information: Juice Financial processes sensitive personal information, including government-issued identification numbers and financial account information (if applicable), only when there is a specific purpose and sufficient necessity, and with the individual's separate consent. Juice Financial conducts personal information protection impact assessments before processing sensitive personal information, as required by the PIPL.

Data Subject Rights: In addition to the rights set forth in our Global Privacy Policy, if you reside in China, you have the following rights: Right to request explanation of automated decision-making; Right to refuse solely automated decisions; Right to copy your personal information (access); Right to supplement your personal information.

Cross-Border Transfers: When personal information is transferred outside of Mainland China, Juice Financial complies with the PIPL's cross-border transfer requirements, which may include: (a) passing a security assessment organized by the Cyberspace Administration of China (CAC); (b) obtaining personal information protection certification from a recognized institution; (c) entering into a standard contract prescribed by the CAC with the overseas recipient; or (d) meeting other conditions provided by laws, administrative regulations, or the CAC. Juice will obtain the individual's separate consent for cross-border transfers, inform the individual of the overseas recipient's details, and conduct a personal information protection impact assessment prior to the transfer.

Data Retention: Personal information will be retained for the minimum period necessary to achieve the processing purpose, unless a longer retention period is required by law.

Deceased Individuals: The close relatives of a deceased individual may, for their own lawful and legitimate interests, exercise the rights of access, correction, and deletion with respect to the deceased individual's personal information, unless the deceased individual made other arrangements during their lifetime.

22. ADDENDUM D: INDIA

Applicable To: Individuals residing in India.

If you have any questions about the Global Privacy Policy or this addendum, please contact our Data Protection Officer at DPO@juicefin.com.

Data Subject Rights: In addition to the rights set forth in our Global Privacy Policy, Indian residents have the following rights: Grievance Redressal; Nomination of another individual to exercise your rights in event of death/incapacity.

23. ADDENDUM E: AUSTRALIA

Applicable To: Individuals residing in Australia.



We will not use nor disclose your personal information unless an appropriate legal basis applies, which includes where: the personal information was collected for that purpose (the primary purpose) or a different (secondary) purpose which is related to the primary purpose of collection, and you would reasonably expect the organization to use or disclose the information for that secondary purpose; you consent; a "permitted general situation" or "permitted health situation" exists; or it is required or authorized by law or on behalf of an enforcement agency.

We may use automated tools for fraud prevention, AML/KYC compliance, and identity verification. You have the right to obtain human intervention, express your point of view, and contest such decisions, if they significantly affect your rights or interests.

We will only process your sensitive information if one or more of the following conditions are met: you have consented to the collection, and the collection of the sensitive information is reasonably necessary for one or more of the entity's functions or activities; collection is required or authorized by Australian law or a court; or a "permitted general situation" or "permitted health situation" exists.

Data Subject Rights: In addition to the rights set forth in our Global Privacy Policy, if you reside in Australia, you have the following rights: If correction of your data is refused, you have the right to request written notice explaining why; Right to file a complaint with your local regulator (Office of the Australian Information Commissioner (OAIC), GPO Box 5218, Sydney NSW 2001. Web: <https://www.oaic.gov.au>) or our Data Protection Officer at DPO@juicefin.com. Complaints received will be reviewed, responded to, and investigated in a timely manner.

Your data is transferred to the United States.

24. ADDENDUM F: TURKEY

Applicable To: Individuals residing in Turkey.

Data Subject Rights: In addition to the rights set forth in our Global Privacy Policy, if you reside in Turkey, you have the following rights: Claim compensation for damages incurred due to unlawful processing of data; Object to any adverse outcome arising from the analysis of processed data exclusively through automated systems; Know the third parties to whom data has been transferred domestically or abroad; Right to request controllers to inform third parties of corrections or deletions.

Residents of Turkey have the right to lodge a complaint with the Personal Information Protection Authority (KVKK Board). Web: <https://www.kvkk.gov.tr>

25. ADDENDUM G: BELIZE

Applicable To: Individuals residing in Belize.

Data Subject Rights: In addition to the rights set forth in our Global Privacy Policy, if you reside in Belize, you have the following rights: Notification regarding rectification or erasure of personal information or restriction of processing of personal information; Right to data portability; Right to prevent processing likely to cause damage or distress; Right to prevent processing for purposes of direct marketing; Automated individual decision-making, including profiling; Information to be provided where personal information is collected from the data subject; Information to be provided where personal information has not been obtained from the data subject; Transparent information, communication and modalities for the exercise of the rights of the data subject.



26. ADDENDUM H: MEXICO

Applicable To: Individuals residing in Mexico.

Under the Ley Federal de Protección de Datos Personales en Posesión de los Particulares (LFPDPPP) and its Regulations, Juice Financial provides this additional information to individuals in Mexico.

Purpose of Processing: Juice Financial collects and processes personal information, including name, contact information, government-issued identification numbers, and financial account details, for the following purposes: (a) facilitating payment processing on behalf of our business clients; (b) identity verification and fraud prevention; (c) compliance with anti-money laundering, know-your-customer, and other legal and regulatory obligations; and (d) responding to inquiries and providing customer support.

Sensitive Personal Information: Juice Financial may collect sensitive personal information, including government-issued identification numbers (such as CURP and RFC) and financial information, solely for the purposes described above. Processing of sensitive personal information requires the express and written consent of the data subject, unless an exception under the LFPDPPP applies.

ARCO Rights: Data subjects in Mexico have the following rights (known as ARCO rights): (a) Access, the right to know what personal information Juice holds and the conditions of its processing; (b) Rectification, the right to request correction of inaccurate or incomplete personal information; (c) Cancellation, the right to request deletion of personal information when it is no longer necessary for the purposes for which it was collected, subject to applicable legal retention requirements; and (d) Opposition, the right to object to the processing of personal information for specific purposes. To exercise ARCO rights, data subjects may contact our Data Protection Officer at DPO@juicefin.com. Juice will respond within 20 business days of receiving the request, as required by the LFPDPPP.

Consent and Revocation: Juice Financial obtains consent for the processing of personal information through this Privacy Policy. Data subjects may revoke their consent at any time by contacting DPO@juicefin.com, subject to applicable legal exceptions. Revocation of consent will not have retroactive effect.

International Transfers: Personal information may be transferred to countries outside of Mexico, including the United States. Juice Financial will inform the data subject and obtain consent for such transfers, except where transfers are permitted without consent under the LFPDPPP (such as transfers necessary for the performance of a contract or required by law).

Use of Cookies and Tracking Technologies: For information about cookies and tracking technologies, please see Section 6 of this Privacy Policy.

26.1 **CONTACT** - Juice Financial Data Protection Officer. Email: DPO@juicefin.com. Phone: 855-687-2114. Mail: P.O. Box 315, New York, NY 10018, United States.

END OF POLICY