

HyperCard Privacy Security

Updated: 03th February 2025

This Privacy Policy ("Policy") explains what you can expect from us and what we need from you in relation to your personal data. Kindly read this Policy carefully as this is legally binding when you use Hypercard Services, without regard to how you access or use them, including through mobile devices.

We reserve the right to revise, amend or update this Policy at any time by posting the updated version on this site including its effective date. Further, we shall announce material changes to this Policy by notifying you by email or through the mobile application ("App) or browser extension ("Extension").

Definitions

The following terms used in this Policy are defined as follows:

"Hypercard Service" refers to a dedicated card program that offers users convenient, efficient, and secure services for prepaid card consumption, access, and playing a vital role in expanding possibilities for global transactions.

"Hypermode Account" means a user-accessible account offered via the Hypercard services.

"Hypermode," "Hypercard Service," "We," and "Us" refers to Hypermode and its wholly owned subsidiaries (also referred to collectively as "we," or "us").

"Personal Information" or *"Personal Data"* refers to any information relating to you, as an identified or identifiable natural person, including your name, an identification number, location data, or an online identifier or to one or more factors specific to your physical, economic, cultural or social identity as a natural person.

Data controller

Some of the services ("Services") that are provided or may be integrated to the Hypercard may require you to set up a Hypercard Account to avail of these products or Services. In relation to these Services and your Hypercard Account, Hypermode uses encryption to protect your information and store decryption keys in separate systems. Data controllers process and retain your personal information on our servers where our data centers are located.

Where we have a legal obligation to do so, we have appointed Data Protection Officers (DPOs) to be responsible for privacy program for the respective data

controllers. If you have any questions about how we protect or use your Personal Information, you can contact our DPOs by email at support@hypermodes.com.

Card services

For Hypercard services, Hypermode works with Xfers Pte.Ltd., a principal member of the VISA network in Singapore, as card issuer. Xfers has partnered with Hypermode to promote the card by co-branding it as “Hypercard.” Another entity, Sumsu, is responsible for providing Know Your Customer (KYC) services for Hypermode, which is used to verify users applying for the card.

Xfers holds the necessary licenses to handle and access the personal data of Singaporean users, which is currently restricted. **This also means that personal data would have to be sent to Xfers for regulatory compliance, and that Xfers will store all KYC data.** For purposes of the Know-Your-Client (KYC) process for onboarding, you may also refer to Xfers's privacy security practices for guidelines.

Protecting personal information

We are serious about guarding the privacy of your Personal Information and we work hard to protect Hypercard and you from unauthorized access to, or unauthorized alteration, disclosure, or destruction of Personal Information that we collect and store. Measures we take include encryption with SSL; the availability of two-factor authentication (2FA) at your discretion, and periodic review of our Personal Information collection, storage, and processing practices.

We restrict access to your Personal Information only to Hypermode employees, affiliates, and subcontractors who have a legitimate business need for accessing such information. We continuously educate and train our employees about the importance of confidentiality and privacy of customer information. We maintain physical, electronic, and procedural safeguards that comply with the relevant laws and regulations to protect your Personal Information from unauthorized access.

Unfortunately, despite best practices and technical safeguards, the transmission of information via the internet is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data during transmission, and any acts of transmission are at your own risk.

Information we may collect about you

When creating a Hypermode Account to avail of the Hypercard Services, we may collect and use the following data about you:

1. Full legal name;
2. Residential address, including country of residence;
3. Email address;
4. Mobile phone number;

5. Date of birth;
6. Proof of identity (e.g., driver's license, passport, or government-issued identity card);
7. Identification number issued by a government;

Other Personal Information or commercial and/or identification information—Whatever information we, in our sole discretion, deem necessary to comply with our legal obligations under various Anti-Money Laundering (AML) obligations, such as Financial Action Task Force Recommendations as, the European Union's 4th AML Directive, and the U.S. Bank Secrecy Act (BSA).

Information we collect about you when creating a Hypermode Account

Account Information. Information that is generated by your Hypermode account activity including, but not limited to, instructions regarding funding and disbursement, orders, trades, and account balances;

Log Information. Information that is generated by your use of Hypercard Services that is automatically collected and stored in our server logs. This may include, but is not limited to, device-specific information, location information, system activity and any internal and external information related to pages that you visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website or App (including date and time; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page;

Location Information. Information that is automatically collected via analytics systems providers to determine your location, including your IP address and/or domain name and any external page that referred you to us, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, and platform;

Correspondence. Information that you provide to us in written or oral correspondence, including opening a Hypermode account, and with respect to ongoing customer support; and logging of phone numbers used to contact us.

Information we receive about you from other sources.

We may receive information about you if you use any the Site, App, Extension, or other services we provide. We are also working closely with third parties and may receive information about you from them. For example:

- a. The banks you use to transfer money to us will provide us with your basic personal information, such as your name and address, as well as your financial information such as your bank account details;
- b. Business partners may provide us with your name and address, as well as financial information;

- c. Advertising networks, analytics providers and search information providers may provide us with anonymized or de-identified information about you, such as confirming how you found our website;
- d. Credit reference agencies do not provide us with any personal information about you, but may be used to corroborate the information you have provided us.

General Provisions

Personal Information you provide during the registration process may be retained, even if your registration is left incomplete or abandoned.

In providing the personal data of any individual (other than yourself) to us during your use of the Hypercard Services, you promise that you have obtained consent from such individual to disclose his/her personal data to us, as well his/her consent to our collection, use and disclosure of such personal data for the purposes set out in this Privacy Policy.

Uses of Personal Data

Below we set forth in a table format, a description of all the ways we may use your personal data as stated above, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are, where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us at support@hypermodes.com if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

What we use your personal information for	Type of information	Our reasons	Our legitimate interests
To provide the Hypercard Services: <ul style="list-style-type: none"> ▪ To carry out our contractual obligations relating to you; including the fulfillment of your orders, the operation of your Hypermode account and the provision of our support services. 	Submitted Information	Fulfilling contracts Our legitimate interests Our legal obligation	Being efficient about how we fulfill our legal and contractual duties. Our commercial interest in providing you with a good service. Complying with regulations that apply to us.

<ul style="list-style-type: none"> To comply with legal and/or regulatory requirements; including, but not limited to anti-money laundering requirements. 	Submitted Information Device Information Third Party Information	Our legitimate interests Our legal obligation	Complying with regulations that apply to us.
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<p>To combat against fraud:</p> <ul style="list-style-type: none"> To verify your identity to protect against fraud, comply with financial crime laws, and to confirm your eligibility to use our products and services; and To help us make better decisions about how we manage your Hypermode Account. 	Submitted Information Device Information Third Party Information	Fulfilling contracts Our legitimate interests Our legal obligation	As part of Hypermode’s efforts to keep our Services safe and secure.
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<p>To help Hypermode to market and provide services that interest you:</p> <ul style="list-style-type: none"> To provide you with information about new functionality, features, or services we offer related to, or similar to, Hypercard Services; To provide you with information about new functionality, features or services we feel may interest you; To make suggestions and recommendations to you and other users of Hypermode; To process applications for Hypercard services, including making decisions about whether to agree to approve any applications. 	Submitted Information Device Information Third Party Information	Our legitimate interests	Developing products and services for existing customers and any applicable fees in relation to them. Defining types of customers for new products or services. Being efficient about how we fulfil our legal and contractual duties. Seeking your consent when we need it to contact you.
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<p>To keep the Hypercard Services available and properly functioning;</p> <p>To administer internal operations necessary to Hypercard Services, including troubleshooting, data analysis, testing, research, statistical, and survey purposes;</p> <p>To notify you about changes to our service, changes to our terms and policies, and as part of our efforts to keep the Hypercard Services, safe and secure.</p>	Submitted Information Device Information	Fulfilling contracts Our legitimate interests Our legal obligation	Being efficient about how we fulfill our legal and contractual duties. Complying with regulations that apply to us.
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Disclosure of your personal information

We may share your personal information with selected third parties including:

- a. Affiliates, operational and business partners, suppliers and subcontractors for the performance and execution of any contract we enter into with them or you;
- b. Analytics and search engine providers that assist us in the improvement and optimization of our site; and
- c. Our group entities or subsidiaries.

We may disclose your personal information to third parties when:

- a. We sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets in order to continue the services for which you have contracted;
- b. We are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the Hypermode Terms of Service and other applicable agreements; or to protect the rights, property, or safety of Hypermode, our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction;
- c. We conduct or cooperate in investigations of fraud or other illegal activity whenever we believe it is reasonable and appropriate to do so;
- d. We seek to prevent and detect fraud and crime;
- e. We receive a lawful subpoena, warrant, court order, or as otherwise required by law;
- f. We seek to protect Hypermode from financial and insurance risks;
- g. We seek to recover debt or in relation to your insolvency; and

We seek information necessary to maintain or develop customer relationships, services and systems.

We do not maintain a published list of all of the third parties with whom we share your personal information with, as this would be heavily dependent on your specific use of our Services. However, if you would like further information about who we have shared your personal information with, or to be provided with a list specific to you, you can request this by writing to support@hypermodes.com.

Profiling and automated decision making

We may in some instances use your personal data, such as your country of residence and transactions and player history, to better address your needs. For example, if you frequently play a specific game, we may use this information to inform you of new product updates or features that may be useful for you. When we do this, we take all necessary measures to ensure that your privacy and security are protected, and we only use anonymous or de-identified data.

We may use Automated Decision Making (ADM) to improve your experience or help fight financial crime. For example, so that we can provide you with a fast and efficient service, we may use ADM to verify your identity documents, or to confirm the accuracy of the information you have provided to us. None of our ADM processes have legal effects on you. In any event, no decision with legal effects on you shall be made solely on the basis of automated processing without your informed and express consent.

Privacy when using digital assets and blockchains

Funding your account or Hypermode may be recorded on a public blockchain. Public blockchains are distributed ledgers, intended to immutably record transactions across wide networks of computer systems. Many blockchains are open to forensic analysis which can lead to deanonymization and the unintentional revelation of private financial information, especially when blockchain data is combined with other data.

Because public blockchains are decentralized or third-party networks that are not controlled or operated by Hypermode or its affiliates, we are not able to erase, modify, or alter personal data from such networks.

Data Retention

As Hypermode is subject to various legal, compliance and reporting obligations, we are required by law to store some of your personal and transactional data beyond the closure of your account with us. Your data is only accessed internally on a need to know basis, and it will only be accessed or processed if absolutely necessary. We will delete data that is no longer required by any relevant law or jurisdiction in which we operate.

Cookies

When you use Hypercard Services, we observe standard practice of placing tiny data files called cookies, flash cookies, pixel tags, or other tracking tools (herein, "Cookies") on your computer or other devices used to visit Hypercard Services. We use Cookies to (i) help us recognize you as a customer, collect information about your use of Hypercard Services to better customize our services and content for you, and to collect information about your computer or other access devices as part to ensure our compliance with our Anti-Money Laundering and Combating of Terrorist Financing obligations and (ii) ensure that your account security has not been compromised by detecting irregular or suspicious account activities.

Email Communications

Subject to applicable laws and regulations, we may from time to time send communications promoting services, products, facilities, or activities to you using information collected from you. When you create a Hypermode Account you are

agreeing to opt-in to all communications from us. We will provide you with an opportunity to opt-out of newsletter communications. We will never provide your Personal Information to third parties for direct marketing or other unrelated purposes without your written consent. Unfortunately, we are unable to allow you to opt-out of the emails we send you for certain legal or administrative purposes.

Cookies

You may decline session cookies if your browser or browser add-on permits but choosing to remove or disable our cookies may interfere with your use and functionality of the Hypercard Services.

Right of Rectification

You have the right to correct any personal information We hold on you that is inaccurate, incorrect, or out of date.

Right of Erasure

You have the right to ask us to delete your data when it is no longer necessary, or no longer subject to a legal obligation to which Hypermode is subject to.

Portability

You may have the right to transfer certain personal data between data controllers, for example, to move your account details from one online platform to another.

Location Information

You may be able to stop the collection of location information through your device settings or by following the standard uninstall process to remove our applications from your device; however, because such data is used by us to meet legal requirements, as well as for ongoing fraud and risk monitoring purposes, choosing to remove or disable location services may interfere with your use and functionality of the Hypercard Services.

Access to information

Subject to applicable laws, you may have the right to access information we hold about you. Your right of access can be exercised in accordance with the relevant data protection legislation. For further information, please contact support@hypermodes.com.

Changes to this Privacy Policy

Any changes we may make to our Privacy Policy will be posted on Hypermode's Site and applications and, where appropriate, notified to you by email. Kindly monitor periodically the Site to see any updates or changes to our Privacy Policy.

Contact

We welcome any questions, comments and requests regarding this Privacy Policy and should be addressed to support@hypermodes.com.

NOTHING FOLLOWS