ONEBIP SERVICE'S PRIVACY NOTICE

Neomobile respects your privacy, and has published this notice (the "Privacy Notice") to explain to you how it treats the Personal Information you submit to us when using the Onebip services; any Personal Information you submit shall be processed in accordance with this Privacy Notice, so please read it carefully before submitting any Personal Information to us.

This Privacy Notice is governed by the Terms of Use, available at www.onebip.com. Each capitalized term not defined in this Privacy Policy will have the meaning set forth in the Terms of Use. This Privacy Policy governs the Personal Information (as defined below) collected through our Website and/or our Service, but does not cover any other information, whether collected in any other manner or for any other purpose, unless specifically stated.

We are committed to protecting your privacy, keeping the Personal Information you share with us secure. It is also important for us to explain to you how we collect, use, disclose and maintain your Personal Information and help you understand these things. We maintain reasonable physical, electronic and procedural safeguards to protect your Personal Information and we have used and will continue to use commercially reasonable efforts to ensure the protection of your Personal Information. Below you will find, in accordance with article 13 of Italian Legislative Decree no.196/03 – "Code on the protection of personal data" (hereinafter, the "Privacy Code"), a description of how we process your Personal Information. For any additional information, please contact us using the contact information provided at section 7 below.

1. WHAT IS "PERSONAL INFORMATION"?

When we use the term "Personal Information" we mean information such as your name, address, mobile device number, telephone number, your date of birth, email address, gender, etc. or any other information that would allow someone to identify you or contact you. You submit Personal Information to us when you register to or use the Services, either as a User or as a Merchant. We also collect Personal Information about you when you use some functionalities of our Service through third-party websites (as described in point 3.2. of the Terms of Use). Moreover, if you are a User, we may also collect and maintain your billing address, Service selections, your wireless or mobile carrier name and account number or payment instrument information, order numbers and your wireless or mobile device's identification.

2. WHY AND HOW DO WE PROCESS YOUR PERSONAL INFORMATION?

We process your Personal Information in order to provide you with the Services described in the Terms of Use and/or in the Merchant Agreement, as applicable, and to carry out any and all activities connected with the Services rendered to you through the Website, the Onebip Platform and the Onebip Portal. We may also process your Personal Information for other purposes expressly set forth by applicable legislation, or in order to comply with requests we receive from any competent authorities. In particular, we process your Personal Information in order to:

- Provide you with the Services or functionalities you requested when registering as a User and/or as a Merchant, or when using Onebip through third-party websites;
- Monitor, track and record data regarding all relevant transactions, so as to allow the delivery and billing of the Contents;
- Verify the accuracy of your Personal Information, including the verification of whether you are of the age required for registering to the Services;
- Prevent and identify possible fraudulent behavior;
- Manage administrative and contractual aspects of your relationship with us;
- Provide you with any necessary technical or customer support service;
- Manage any possible complaints or litigation;
- Use Personal Information in order to make any communications regarding the contractual relationship between you and us.

We process your Personal Information mostly by electronic means, although it is possible that some of your Personal Information may be processed in hard copy documents (such as, for example, invoices).

3. DO YOU HAVE TO SUBMIT YOUR PERSONAL INFORMATION TO US? WHAT IF YOU DECIDE NOT TO?

Your submission of Personal Information for the aims described in section 2 above is a necessary condition for us to provide you with the Services or any functionality thereof.

If you do not want to provide us with the Personal Information requested, we will not be able to provide you with the Service or any functionality thereof.

4. CAN WE USE YOR PERSONAL INFORMATION FOR MARKETING PURPOSES?

On the terms of article 130(4) of the Privacy Code, we may send to the e-mail address you submit to us, information and marketing material, including newsletters, which regard exclusively services or functionalities which are similar to those Services or functionalities of Services you have used and/or registered to use with Onebip. We will always give you the opportunity to oppose to receive such materials, at any time, and without any costs ("Opt-Out"). If you decide to Opt-Out, you will only have to communicate that choice to us, using the contacts provided in section 7 below. Such choice will have no consequences whatsoever in your use of the Services or any functionality thereof.

We do not serve you with any other marketing or commercial communications which do not regard services or functionalities similar to those you already use, or any type of marketing or commercial communication sent to you through means other than your e-mail (such as your postal address, fax or phone). If we plan on sending you any such communication, we will ask for your express consent in advance ("Opt-in"). You will of course be entitled to withdraw any such consent at any time and free of charge, using the contacts provided in section 7 below. Any such withdrawal of consent will have no consequences whatsoever in your use of the Services or any functionality thereof.

Any communications sent to you for marketing purposes in accordance with this section shall – on the terms of article 8 of legislative decree no. 70 of 9 April 2003 as amended – be clearly identified as having a commercial nature and as being addressed to you by Neomobile. If applicable, such communications will also indicate that (i) they regard a promotional offer such as a discount, prize or offer and the respective conditions of access; and/or (ii) they regard promotional contests or games, and the respective conditions of participation.

5. TO WHOM CAN WE COMMUNICATE YOUR PERSONAL INFORMATION?

We adopt all necessary measures to ensure that your Personal Information shall remain safe, private and confidential at all times. We limit access to your Personal Information by our own employees to individuals who are authorized for the proper handling of such information and any employee found violating our standards of security and confidentiality will be subject to our disciplinary processes.

Your Personal Information may be communicated to third parties who carry out activities which are ancillary and instrumental to those of Neomobile. In particular, and exclusively for the purposes described in section 2 above, your Personal Information may be communicated to:

- Companies which render services of customer support on our behalf, such as Onebip Serbia Preduzeće Onebip D.O.O. Beograd (a company within the Neomobile group) or Zendesk Inc.;
- Companies which provide us with the Contents which you acquire through the Service or functionalities thereof (the so-called Merchants), for delivery, invoicing and customer support purposes;
- Your mobile phone operator and/or internet access provider, for invoicing and customer support purposes;
- Companies which provide us with technical support to the Onebip platform, in order to allow it to run smoothly, and allow us to efficiently
 provide you with the Service or functionalities thereof that you require from us.

These third parties have undertaken to treat your Personal Information as private and to process it in accordance with the applicable legislation and exclusively for the purposes indicated in section 2 above. Please note that this Privacy Notice applies only to the Personal Information you provide to us and which we may communicate to these third parties. This Privacy Policy does not cover any use of personal information that a third party may collect from you directly. Before you provide any personal information directly to any third parties, we encourage you to investigate their privacy policies and, if necessary, ask any questions directly to them in this regard.

Furthermore, we may make your Personal Information available to other third parties in the following limited circumstances:

- When we are compelled to do so by a governmental agency, court or other entity (e.g., to respond to subpoenas, court orders or legal process):
- In legal proceedings, if we believe your actions violate any law, regulation, any term or condition of the Terms of Use, including, without limitation, this Privacy Policy, or any of Additional Terms or if you threaten the rights, property or safety of us, our parent, subsidiaries or affiliated companies, our Services, any of our operational service providers, suppliers, advertisers, customers, Users or Merchants; or
- In the event of a bankruptcy, merger, acquisition, transfer of control, joint venture or other business combination involving us.

6. WHAT ARE YOUR RIGHTS REGARDING OUR PROCESSING OF YOUR PERSONAL INFORMATION?

On the terms of article 7 of the Privacy Code, you are entitled to obtain confirmation of whether we have collected any of your Personal Information, even if we have not yet registered any Personal Information. Moreover, in accordance with the same article, it is your right to require us to:

- give you access to your Personal Information;
- update, correct or complete your Personal Information and to communicate any such operation to any third parties to which your Personal
 Information has been communicated in accordance with section 5 above;
- cancel, make anonymous or block any of your Personal Information which is being processed illegally and to communicate any such operation to any third parties to which your Personal Information has been communicated in accordance with section 5 above; or
- to oppose, in whole or in part, to the processing of your Personal Information, for legitimate reasons; however, you may oppose to the processing of your Personal Information for marketing purposes, freely, in accordance with section 4 above.

You may exercise any of these rights by contacting us using the contact details provided in section 8 below.

7. USE OF "COOKIES"

On the Website, we do not use any cookies which enable us to register, track and/or access any information regarding your navigation habits or the use you make of the services. The only cookies we use are cookies which enable us to remember your Personal Information (such as mobile phone number) so that you don't have to re-enter it every time you access the Website, and cookies which allow us to remember the credentials you use

in order to access the website (i.e., username and password). These last cookies will only be used if you expressly request us to remember such information for you, by clicking the "remember me" box when you register and/or log-in. The cookies described above are, on the terms and for the effects of Legislative Decree no. 69/2012, necessary for us to provide you with services that you request. WHO IS RESPONSIBLE FOR THE PROCESSING OF YOUR PERSONAL INFORMATION AND HOW CAN YOU REACH THEM?

As "Data Controller", we are directly responsible towards you and any competent authorities for the manner in which we process your Personal Information. You may contact us in order to exercise any of the rights described in section 6 above, to obtain further information on how we obtained your Personal Information, how and why we process it and who we communicate your Personal Information to, to obtain more information regarding us, to Opt-Out or to Opt-In from receiving marketing communications from us in accordance with section 4 above or, more generally, for any questions, concerns or feedback you have regarding our processing of your Personal Information, using the following contact information:

Neomobile S.p.A

Att.: Onebip Services' Customer Care Largo Donegani 3 Milan, Italy e-mail: support@onebip.com

9. HOW DO WE UPDATE OUR PRIVACY POLICIES AND THIS PRIVACY NOTICE?

We verify the accuracy and sufficiency of our policies with regard to privacy and safety on a regular basis and, if applicable, we may amend such policies and the present Privacy Notice due to changes in the applicable legislation or in our own organization and internal policies or due to technology evolution. We encourage you to check this Privacy Policy often so you are aware of the most current terms and conditions that apply to you. We shall publish any such new versions of this Privacy Notice on the Website immediately as they become effective.