

PRIVACY POLICY

Your privacy is important to SOFITEC. As part of the use of the SEZA digital wallet and related services, SOFITEC may collect and process certain personal data about you, including when you use your SEZA wallet, access the SEZA mobile application, or contact customer support.

SOFITEC is committed to protecting the confidentiality, integrity, and security of the personal information entrusted to it. Personal data will only be used and disclosed in accordance with this Privacy Policy, with your authorization where required, or where permitted or required by applicable law or regulatory obligations.

This Privacy Policy explains how SOFITEC collects, uses, stores, protects, and shares personal data in connection with the SEZA services and applies to all SEZA users.

Introduction

Personal data refers to any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly. Information relating to a legal entity is not personal data, but information relating to a director, ultimate beneficial owner, contact person, or representative of a legal entity is considered personal data.

Processing: any operation or set of operations performed on personal data or sets of personal data, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise.

The personal information that SOFITEC collects and processes may therefore include

- Your name, address, phone number, a selfie, your profession or the nature of your business, and your date of birth;
- A form of identification, such as a valid driver's license, ID card, or passport. SOFITEC may also request documents such as a recent utility bill to verify your name and address;
- Information about beneficial owners, intermediaries, and other parties;
- Information about your transactions, including payment history, account activity, and how you intend to use the account or service, as well as the source of any incoming funds or assets;
- Information about third parties, such as your spouse, if you request certain services.

In addition, SOFITEC offers mobile applications or services that use information about your location. If you choose to use these applications or services, SOFITEC may, if your mobile device settings allow it, collect information about your location (e.g., GPS signals) to provide you with the services you request.

Purpose of Data Collection

SOFITEC may collect your personal information for the following purposes:

- To verify your identity and other personal information;
- To set up, manage, and provide the services you have requested;
- To comply with legal and regulatory requirements;
- To ensure the normal operation of SOFITEC;
- To assist SOFITEC in collecting a debt or enforcing an obligation you owe us;
- To respond to a local or foreign court order, a search warrant, or any other request from legal authorities, or to comply with the discovery rules of a local or foreign court;

- To investigate and resolve claims or complaints;
- To prevent or detect fraud or criminal activity, or to manage and resolve any actual or potential loss related to fraud or criminal activity.

Data Collection for Marketing Purposes

SOFITEC may tailor its website and/or marketing materials to your needs based on your personal information.

Data Collection for Sharing with Third Parties

For the purposes described in this Policy, SOFITEC may share your personal data within all subsidiaries of the Banque de l'Union Haïtienne S.A. (BUH) group, of which SOFITEC is a part.

SOFITEC may also share your personal data with third parties. This may include, but is not limited to:

- Third parties related to the services SOFITEC provides;
- Third parties with whom SOFITEC engages to comply with legal and regulatory obligations;
- Third-party vendors involved in the processing of your personal data for the purposes described in this Policy, such as IT vendors, communication service providers, or other vendors to whom SOFITEC outsources certain support services.
- Third parties to the extent that the processing of your personal data is necessary to ensure the normal operation of SOFITEC.
- The third parties to whom we transfer your personal data are themselves responsible for complying with privacy laws. SOFITEC is not responsible for the processing of your personal data by these third parties.

Retention of Your Personal Data

SOFITEC may retain and use information about you in its records for as long as necessary to achieve the purposes described in this policy or to comply with applicable laws and regulations.

Data security

SOFITEC will collect and process data using appropriate technical or organizational measures to ensure adequate security of personal information, including protection against unauthorized or illegal processing (e.g., by malicious hackers) and against accidental loss, destruction, and/or damage.

You are responsible at all times for the security of your account access information. By allowing third parties to access information related to your account, you assume full responsibility for transactions carried out on your account and/or the personal data associated with it.

In the unlikely event of a data breach posing a high risk to customers' personal information, SOFITEC will, if necessary, notify the affected customers as soon as possible.

Your Rights as a SOFITEC Customer (including any SEZA user)

When your personal data is collected and processed, you have all the rights provided by law. For example, some of these rights are as follows:

- You have the right to be informed, upon request, of the collection and use of your personal data;
- You have the right to access your personal information stored in our files and to obtain copies of it;
- You may at any time challenge the accuracy and completeness of your personal information and request that it be corrected if necessary;

- You have the right to request the deletion of your personal data if such data is incorrect, does not serve a reasonable purpose, or is no longer relevant;
- You have the right to withdraw your consent to the collection of specific personal data. You may do so by sending an email to our Customer Service at info@seza.ht or info@sofitec.ht ;
- You have the right to ask why your personal data is being processed in a certain way by SOFITEC; you may ask us not to send you personalized marketing communications.

Please note that the above rights are not absolute in all circumstances. In certain cases, SOFITEC may have the right to refuse requests in order to comply with its legal and/or regulatory obligations.

Cookies

This site uses various types of cookies, including cookies necessary for the site's operation. Cookies are small text files that websites may use to enhance the user experience. For certain types of cookies, we require your consent. Some cookies are placed by third-party services that appear on our pages. You may modify or withdraw your consent at any time via the cookie policy on our website. Please refer to SOFITEC's cookie policy published on the SOFITEC website.

Additional Information

SOFITEC may amend this Policy from time to time to reflect changes in legislation, technology, or other matters that may arise. We will post the revised Policy on our website, make it available at our branches, or may also send it to you by mail. If the changes to the Policy are significant, we will notify you in writing.

If you have a question or complaint regarding our Privacy Policy or the processing of your personal information, or if you would like to receive a copy of it, please feel free to contact us at info@sofitec.ht or by calling our Customer Service at (509) XXX-XXXX or (509) XXX-XXXX.

Policy updated: April 27, 2026.