

SAFEGUARD AND FINANCIAL PRIVACY POLICY

1. INTRODUCTION Protection of your personally identifiable information is important to Walli IT, Inc., and we would like to take this opportunity to explain our SAFEGUARD AND FINANCIAL PRIVACY POLICY (hereinafter - "Privacy Policy"). Walli IT, Inc. IS NOT A COVERED ENTITY FOR PURPOSES OF THE HEALTH INSURANCE PORTABILITY AND ACCOUNTABILITY ACT OF 1996 ("HIPAA"), NOR IS THE INFORMATION PROVIDED BY YOU TO Walli IT, Inc. CONSIDERED PROTECTED HEALTH INFORMATION UNDER HIPAA. AS SUCH, THE ADDITIONAL PRIVACY AND SECURITY PROTECTIONS AFFORDED TO CONSUMERS/PATIENTS UNDER HIPAA ARE NOT CONTEMPLATED BY, NOR CONTAINED WITHIN, THIS PRIVACY POLICY.

2. PURPOSE AND NOTICE This Privacy Policy has been developed for purposes of compliance with the Gramm-Leach-Bliley Act, 15 U.S.C. 6802 (the "GLBA") and shall serve as both your initial customer relationship and annual "Privacy Notice" as defined under the GLBA. Our Privacy Policy applies to those persons who obtain from us financial products or services to be used for personal, family or household purposes. You agree to this Privacy Policy, in its entirety, when you press "Agree" button on the screen of our self-service kiosk or the self-service kiosk of our agent.

3. BRIEF This Privacy Policy explains: (a) The types of information we may collect about you. (b) The types of information we may disclose to third parties. (c) The types of third parties to whom we may disclose information. (d) How we protect your personally identifiable information. (e) How you may instruct us not to disclose certain information about you which we are not otherwise permitted to disclose by law.

4. TYPES OF INFORMATION WE COLLECT: We collect the following personally identifiable information (hereinafter – "personal information") from you: (a) Your name, address, telephone number, birth date, credit card number. (b) Information about your transactions with us or our agents and business partners, such as your payment history. (c) Representations made by you to us, such as "your compliance with all applicable laws". (d) Information we collect or that you provide to us when you contact our call-center, such as your name, address, telephone numbers, payment transaction number. (e) If you request e-mail contact from us or send us an email, we may retain your e-mail address and the messages themselves.

5. PRIVACY STATEMENT: We do not disclose, nor do we reserve the right to disclose, any personal information about our consumers (customers) to anyone, except as permitted by law. We provide access to your personal information to our employees solely on the "need to know" basis, having preliminary explained the importance of protecting your personal information to our employees.

6. SAFEGUARD MEASURES: We have Information Security Policy and procedures in place that we believe are reasonably designed to protect the security and confidentiality of your personal information. These include confidentiality agreements with our agents and other business partners helping us to provide services to you, password-protected user access to our information data base and computer files, training of our employees, and appropriate measures to enforce employee responsibilities regarding this Privacy Policy. We also maintain physical, electronic and procedural safeguards to protect the confidentiality and security of your personal information. Ongoing procedures are performed for monitoring the effectiveness of controls over your personal information, based on a risk assessment, and for taking timely corrective actions where necessary.

7. USE, RETENTION AND DISPOSAL: We use your personal information to help us provide services to you. We retain your personal information pursuant to our Information Security Policy which also dictates how such personal information is disposed. The information provided by you to facilitate your purchase/payment transaction is maintained in our web based secured software. We retain your personal information for as long as is needed to fulfill its stated purpose.

8. DISCLOSURE TO THIRD PARTIES: We may disclose Information we receive from you on the confidential basis to the third party service providers, such as our agents, payment gateways, payment transaction processors and non-financial service providers (network operators, retailers). Your personal information may be disclosed to such third parties and is used by such third parties to the extent necessary to allow them to perform the services they provide to us and solely for the purposes of processing and completion of the purchase/payment transaction initiated by you. Certain third-party service providers, such as payment gateways and other payment transaction processors, have their own privacy policies in respect to the information Walli IT, Inc. is required to provide to them for your transactions. Certain providers may be located in, or have facilities that are located in, a different jurisdiction than either you or us. Therefore, if you elect to proceed with a transaction that involves the services of a third-party service provider, then your personal information may become subject to the laws of the jurisdiction(s) in which that service provider or its facilities are located. For example, if you are located in the United States and your transaction is processed by a services provider located in Canada, then your personal information used in completing that transaction may be subject to disclosure under Canadian legislation. For these providers, we recommend that you read their privacy policies, so you can understand the manner in which your personal information will be handled by these providers. Walli IT, Inc. does not disclose your personal information to third parties for marketing purposes.

9. CHANGES: You may request a change to your personal information provided to us by contacting info@walli.com. Please note, that your request will be considered and approved by us before changes to your personal information take effect.

10. OPT OUT RIGHT: If you are comfortable with our Privacy Policy and do not mind if we disclose your personal information in order to provide our products and services, to respond to your inquiries and to provide better customer service, then you do not need to take any further action at this time. If you prefer that we not disclose your personal information to some types of third parties described in this Privacy Policy, then you may direct us not to make those disclosures by sending a relevant message to the following e-mail address: info@walli.com. Please remember, however, that even if you decide to opt out of having your personal information disclosed to certain third parties, we may still disclose personal information about you as permitted or required by law. If you are opting out for the first time, it may take up to ten (10) business days to process your request. Your decision to opt out will apply to all financial products and services you obtain from us.

11. ACCEPTANCE AND AMENDMENTS TO THIS PRIVACY POLICY: By agreeing to the terms and conditions of this Privacy Policy in the interface of our mobile application, you accept this Privacy Policy in its entirety. Walli IT, Inc. reserves the right to modify, alter or otherwise update this Privacy Policy at any time, by posting such changed, updated or modified policy on its website www.walli.com. Notwithstanding any changes in our Privacy Policy, ITBILLION USA will use your personal information in a manner consistent with the Privacy Policy in effect at the time you submitted such information, unless you give us your consent to do otherwise.

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