

TILA TOP UP® Privacy Policy

Tila Top Up® held by Prasan Enterprises Inc (hereinafter “TILA TOP UP®”) is committed to the protection of its users’ privacy and aims to protect its users against the misuse of their personal identifiable information to third parties. The Privacy Policy below, which is incorporated to the Terms and Conditions, explains the practices that apply to your TILA TOP UP® Registered User Account information, as well as the privacy setting you choose to protect and share information as well as used on the website generally.

This Privacy Policy applies only to information, and meta information over the internet, TILA TOP UP® collects about you as a user of their Website, and through your Registered Commercial or Purchaser Account or Mobile Application. This policy does not apply to information independently collected by TILA TOP UP®’s IMTU, DMTU and communications providers when you use the actual service purchased from TILA TOP UP®. This Policy only relates only to information that is accessible from the www.TilaTopUp.com website, its Mobile Application and Registered Commercial or Purchaser Accounts. TILA TOP UP® will not sell or share your personally indefinable information unless you have authorized such use.

When using our website, mobile application and Registered Commercial or Purchaser Accounts, you consent to the collection, transfer, manipulation, analysis, storage, and disclosure about you and other uses of your Registered Commercial or Purchaser Accounts, purchase habits or website visit as described in this Privacy Policy. Irrespective of which country that you reside in or create information from, your information may be used by TILA TOP UP® in the United States or any state where TILA TOP UP® operates.

Upon registering a Registered Commercial or Purchaser Account with TILA TOP UP®, you will be asked for certain personally identifiable information such as but not limited to your full name, business name, username, email address, mailing address, telephone number, and/or credit card or debit card numbers. You agree and understand that this personally identifiable information is voluntarily provided to TILA TOP UP® by you. To ensure the safety of your personal identifiable information, we recommend that you periodically change your password. In case you have forgotten your password, TILA TOP UP® can be notified via email and a password reset will be sent to the email associated to that account username. Your personal password is confidential and encrypted, which ensures its secrecy.

PRIVACY POLICY ADDITION FOR CALIFORNIA

California Consumer Privacy Act of 2018, as amended, (CCPA) and compliance with CCPA regulations.

Data Privacy and Rights for California Account holder and internet Users. In compliance with California law and regulation concerning privacy, the following privacy policies apply to our use of personal data collected on our website, through our mobile application, and within our account portal with regard to California residents and households.

PLEASE BE AWARE. TILA TOP UP, INC collects user data on our websites (TilaTopUp.com; TilaRetail.com and TilaAdmin.com and the *Tila Top Up® Mobile Application*) to improve our services, enhance and improve our user experience, and understand the consumers who interact with our website and how they find us and our services. We interface with online marketing to find our landing pages and links from our social media campaigns directing website browsers to

our landing page and service offerings. This is used only for our own marketing and analytics. We **DO NOT** sell or commercialize or sell personal data or profile data of website browsers. We maintain written policies on the collection, internal use, storage and disclosure of personal data in our regular business. We **DO NOT** use web trackers or beacons. As a California resident who visits our websites, purchases from us online, or maintains a user account through the Tila Top Up® Mobile Application, you have the following rights that we observe:

Right to know what personal data we collect. Some of the data we collect may be information that identifies, relates to, or could reasonably be linked with you or your household. Some of this information is essential to us providing the services we provide you. This includes cellular telephone number(s), area codes of those telephone numbers, email address, records of services you purchased, internet browsing history, Social Media referrals, credit or debit cards numbers, bank information. Some of this information under the CCPA could be used to reasonably create a personal profile about your characteristics or preferences, to some extent, either in whole or in part. Some of this information includes Sensitive Personal Information under the CCPA including account log-in, financial account, debit card, or credit card number with any required security code, password, and your user credentials. This information will only be used by TILA TOP UP, INC for internal purposes in the performance and marketing of our service. If you are an account holder under the ***Tila Top Up® Mobile Application*** or through our online account portal you may inquire about what information we collect, including sensitive information we collect and use, by contacting us at Info@tilatopup.com If you are a consumer website browser concerned about what information we collect from the website personal to you and your visit, you may inquire at Info@tilatopup.com

Right to Deletion, Correction or Opt-out. As a California resident and user of TILA TOP UP, INC's services the following apply:

- 1) As a website browser of our websites, you may request Deletion. Correction and/or Opt-Out of our data for our internal purposes. Please contact us at Info@tilatopup.com for any such request and have available information such as the date of your visit(s) to our website and any other information that might assist us in ensuring that your information is deleted or corrected. All Opt-Outs may be processed through the same email address. We will contact you to coordinate the process. All information obtained from our website is stored in secure network platforms with reasonable and commercially current data privacy protections for the type of data collected. In the event of a data breach, TILA TOP UP, INC will give applicable notice to the public as prescribed by law.
- 2) As a Customer or Retail user of our websites or portals, Sensitive information about you or your business is essential to the performance of our services. So far as you are a customer, use the mobile application, or have an open account, this information may not be deleted without frustrating the operation of our services. Opt-out of the use of this Sensitive Data is not available but may be requested as a part of closing your account, Correction of Sensitive Data may be performed through your account by you directly. Retail users, who are businesses and provide information that does not have the potential to identify a California household, or resident individually, is subject to exclusions under the CCPA.

TILA TOP UP, INC does not discriminate on any basis its compliance with the CCPA or with regard to any request from a California resident as related to a California household.

Modifying Your Personal Information

If you are a registered user of our website, we provide you with tools to access or modify the personal information you provided to us and associated with your Commercial or Purchaser Account.

Our Policy towards Children

TILA TOP UP®'s services are not directed to people or users under the age of eighteen years old (an 18-year-old). If you become aware that your child has provided us with personal information without your consent, please contact us. We do not knowingly collect personal information from children under the age of eighteen years old (an 18-year-old). If we discover that a child under the age of eighteen years old (an 18-year-old) has in fact provided us with personal information, we take steps to remove such information and terminate the child's account on our website.

Cookies

As a user of TILA TOP UP®'s website, mobile application or Registered User Account, you authorize TILA TOP UP® to use resources such as, but not limited to, cookies, analytics and metadata in order to provide a better and more personalized website. For example, Cookies are a small amount of data, usually including an anonymous unique identifier, sent to your computer through a website and stored on your computer's disk. You can configure your browser to accept all cookies, reject them, or be notified when a cookie is sent.

WARNING: IF YOU CHOOSE TO REJECT ALL COOKIES IN YOUR BROWSER, YOU WILL BE UNABLE TO USE ALL THE RESOURCES AND SERVICES OFFERED BY TILA TOP UP®.

TILA TOP UP® uses their own cookies and analytics metrics for various purposes, including but not limited to:

- Access information in order to personalize your content;
- Display service and product listings geared to your Account;
- Estimate purchase limits;
- Conduct research to improve the content and services;
- Administer and improve the user experience of this website;
- enable your access to and use of the website services more flexibly;
- Track eligibility for promotional rewards as a purchaser through TILA TOP UP®;
- send to you statements and invoices;
- process and collect payments from you; and
- send you marketing communications when you consent.

Your privacy is important to TILA TOP UP®; and this privacy statement provides information about the personal information that TILA TOP UP® collects, and the ways in which TILA TOP UP® uses that personal information.

Personal information collection

Where TILA TOP UP® discloses your personal information to its employees, agents or sub-contractors for transactional purposes it is only for these purposes. The employee, agent or sub-contractor in question will be obligated to use that personal information in accordance with the terms of this privacy statement. In addition to the disclosures reasonably necessary for the purposes identified elsewhere above, TILA TOP UP® may disclose your personal information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

Securing your data

TILA TOP UP® will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information. TILA TOP UP® will store all the personal information you provide on its secure servers. Information relating to electronic transactions entered into via this website will be protected by encryption technology.

Cross-border data transfers

Information that TILA TOP UP® collects may be stored and processed in and transferred between any of the countries in which TILA TOP UP® operates to enable the use of the information in accordance with this privacy policy. In addition, personal information that you submit for publication on the website will be published on the internet and may be available around the world. You agree to such cross-border transfers of personal information.

Updating this Policy

TILA TOP UP® may update this privacy policy by posting a new version on this website. You should check this page occasionally to ensure you are familiar with any changes.

Other websites

This website may from time to time contain links to other websites, more particularly to IMTU, DMTU and communications providers for whom we distribute and sell their services and top-up credits. TILA TOP UP® is not responsible for the privacy policies or practices of any of these third-party providers once you leave our website.

Lawful Legal Requests

TILA TOP UP® can receive lawful legal requests with regard to you as a User of this website. A Lawful Legal Request is a request for information by a regulatory or law enforcement agency, or alternatively by a court or civil subpoena under the operation of law or by statute. In such cases, TILA TOP UP® is required to supply this information in accord with the request. Often, the request includes a mandate or order that TILA TOP UP® is required to respond without notice to the User. Please be advised that TILA TOP UP® may

or may not advise you of any Lawful Legal Requests it receives concerning your account, and that, in such an instance TILA TOP UP® has an obligation to abide by the mandates of the Request which includes not disclosing its existence to the User.

Contact TILA TOP UP® with Privacy Questions

If you have any questions about this privacy policy or Tila Top Up's® treatment of your personal information, please email us at: privacy@tilatopup.com to speak with one of our representatives to address your concerns or questions.

Changes to this Policy

TILA TOP UP® may revise this Privacy Policy from time to time. The most current version of the policy will govern our use of your information. If we make a change to this policy that, in our sole discretion, is material, we will amend this browser wrap policy thirty (30) days prior to their effect **or** provide notice of the Change and effective date within your Registered User Account. By continuing to access or use the Services after those changes become effective, you agree to be bound by the revised Privacy Policy.

This Privacy Policy was last updated by TILA TOP UP® on November 17, 2024. This Privacy Policy shall be revised every six (6) months for policy changes and corrections. Changes to this Privacy Policy will be noticed to the Customer by amendment to this browser wrap policy thirty (30) days prior to their effect. All services and products sold shall be subject to the then posted Terms and Conditions where they do not conflict with existing written agreements with a MERCHANT.