HAYHAY ELECTRONIC MONEY AND PAYMENT SERVICES INC.
PERSONAL DATA BREACH RESPONSE PROCEDURE

1. PURPOSE

The purpose of this Procedure is to determine the steps to be taken, responsibilities and notification processes in the event of a data breach relating to personal data processed by Hayhay Electronic Money and Payment Services Inc. (the Company).

2. SCOPE

This Procedure covers all personal data processed by the Company and any unauthorised access, disclosure, loss or similar data breaches affecting such data.

3. DEFINITIONS

• **Data Breach:** The unauthorised acquisition, access, disclosure or destruction of personal data.
• **Board:** The Personal Data Protection Board.
• **Data Subject:** The natural person whose personal data is processed.

4. DETECTION OF DATA BREACHES

A data breach shall be reported immediately to the Legal Advisory Office and the Company's Personal Data Protection Committee when detected by:

- employees,
- the information technology unit,
- service providers.

5. INITIAL RESPONSE

Upon detection of a data breach;

- the source of the breach is identified,
- the breach is immediately stopped,
- access to affected systems is restricted,
- the scope of the breach and the categories of data affected are determined.

6. ASSESSMENT AND RECORDING

In coordination with the Legal Advisory Office;

- the nature of the breach is assessed,
- the number of affected individuals is determined,
- the types of personal data affected are assessed, and the data breach is recorded.

7. NOTIFICATION TO THE BOARD

If the breach is likely to affect the rights and freedoms of the individuals concerned, notification shall be made to the Board within 72 hours at the latest.

8. INFORMING THE INDIVIDUALS CONCERNED

If the breach poses a high risk to the individuals concerned, they shall be informed as soon as possible using appropriate communication channels.

9. PREVENTIVE MEASURES

Following the breach:

- technical and administrative measures are taken to prevent similar breaches from recurring,
- necessary process improvements are made.

10. ENFORCEMENT

This Procedure shall be enforced from the date it enters into force.