

Privacy Policy

This Privacy Policy describes the information collection, use and disclosure practices of Payfare Inc. and its affiliates (“Payfare”, “we”, “us”, or “our”). This Privacy Policy applies to current and former individuals and their relationships with us relating to the products and services that you may request or receive from us, including through our website or mobile apps (“Our Services”). For purposes of this Privacy Policy, an affiliate is a company that is related by common control or ownership (e.g. companies in the same corporate family), including non-financial companies, and information includes personal information obtained in connection with Our Services.

Information We Collect And Sources Of Information:

We may collect personal information about you. For our card and payment programs, this will be done with your express consent during the application process. Personal information is information about an identifiable individual and includes information such as your social security number, date of birth, residential address, phone number, government issued identification, transaction history, device type, internet protocol address or geo-location. We collect your personal information required to provide Our Services to you, which includes the following purposes: responding to your queries, identification, account creation and management, security measures, fraud prevention and investigation, account servicing and marketing purposes. We obtain information about you directly from you (e.g., if you submit information to us through our website, e-mail or mobile applications), through your use of Our Services, and from third parties (such as your payers, credit bureaus and demographic firms). Occasionally, we may also collect information about you online using “cookies” (small pieces of data stored by your Internet browser on your computer) or other tracking technology that may be used to remember passwords for you, to track your website or mobile application usage with us and to provide you with customized content among other things. You may choose to decline cookies if your browser permits but doing so may affect your use of the website and your ability to access certain features of the website or engage in transactions through the website.

Information Sharing:

Your information will be used and disclosed for the purposes of complying with the law and to provide you with Our Services or to enhance Our Services.

We may disclose your personal information:

- When we are required or authorized by law to do so (e.g. in response to a summon or a subpoena);
- To investigate or prevent potential fraud, loss or harm;
- When you have consented to the disclosure;
- To establish or collect amounts owed to us;
- To third-party service providers engaged to support Our Services.

Your personal information may be shared with service providers (e.g. payment processors, issuing banks, customer support providers, payers and identification verification providers) in order to provide Our Services to you. Our service providers are not authorized by us to use or disclose your information except as necessary to perform services on our behalf or comply with legal requirements. If you do not wish us to provide your personal information to such service providers, we may be unable to provide you with Our Services or adequately respond to your query.

We may also, from time to time collect and share summarized, combined, generic, aggregated, and/or anonymized information derived from personal information with our service providers and trusted partners for any of the purposes outlined in this Privacy Policy. In doing so, we will take steps such that the summarized, combined, generic, aggregated, and/or anonymized information cannot be identifiable to you or to any person.

We use international service providers to process and/or store personal information for us. Please note that personal information in the custody of these service providers may be subject to access by the law enforcement authorities of those jurisdictions in which the service providers are located.

Our Security Procedures:

We maintain commercially reasonable physical, technical and procedural safeguards to guard Information about you. We limit the access of personal information to those employees, service providers, and agents who assist us in providing Our Services. We also require third parties to whom we disclose personal information to adhere to this Privacy Policy and to establish information security procedures.

You also play an important role in protecting your personal information. Your password and security codes are private and you should not share them with anyone. We will never

ask you for your password PIN, or the security code that is sent to you by SMS text message or e-mail when you log into your account. Keep your passwords, PIN and other account details confidential and do not share them with others.

Due to the nature of internet communications and evolving technologies, we cannot ensure that information we collect, store or transfer online will remain free from loss, interception or alteration and Payfare and its service providers shall have no liability for any loss, interception or alteration of personal information.

Your Access to Information:

You can access your account details and transaction history at any time through our mobile applications or, where applicable, by logging into your account online. Subject to any exceptions prescribed by law, you can access and correct your personal information and challenge the accuracy and completeness of the information we have about you. We may deny access when required or authorized by law. For example, we may deny access when granting access would have an unreasonable impact on other people's privacy or when necessary to protect our confidential commercial information and the requested information cannot be severed from the balance of the record in which it is contained. If we deny your request for access to, or refuse a request to correct, information, we will explain why.

Retaining Your Information:

We keep your information as long as reasonably required to complete our dealings with you, or as required by law, whichever is longer.

If you no longer wish to use Our Services and/or wish to withdraw your consent to our use of your personal information to provide you with Our Services, you may request the account that you have created to use Our Services be closed by contacting: privacy@payfare.com.

You can also request that we delete or remove your information from our records by contacting our Privacy Officer at the contact information set out below. Subject to our requirements for continued retention of your information (e.g., for auditing purposes) or to fulfill our legal obligations, we will make every reasonable effort to honor your request.

How This Policy Applies to You:

The examples contained in this Privacy Policy are illustrations only and are not intended to be all-inclusive. If you decide to terminate your account, or if we close or suspend your account, we will continue to adhere to the privacy policies and practices described in this Privacy Policy to the extent we retain information about you. We may amend this Privacy Policy from time to time. Your continued use of Our Services following a change to this Privacy Policy means that you provide your consent to the collection, use and disclosure of your personal information as set out in the updated Privacy Policy. Please check back periodically for updates.

Our website and Our Services are not intended to solicit information of any kind from individuals under the majority in their jurisdiction of residence (“Minors”) without the required consent from their parents/guardians. If we become aware of any information we possess that may belong to a Minor, we will immediately obtain parental consent or delete this information from our servers. If you are a parent/guardian and you suspect that your child may have submitted personal information to us, please contact us at the information below.

We may provide links to third party sites. You should review their privacy policy and other terms and conditions, as they may be different from ours and Payfare is not responsible for the privacy, accuracy, reliability or security of third party sites.

Contact Us

If you have any questions, concerns or complaints about this Policy, please contact our Privacy Officer by emailing us at privacy@payfare.com. We will respond to your request or investigate your concern as quickly as we can.

If you choose to communicate with us via email, please be aware that email is not a 100% secure medium for sending personal or confidential information to us.

Additional Provincial and State Disclosures

Québec: In order to provide you with Our Services, your personal information will be transferred to third party service providers that we contract with that are located outside the province of Québec. We do not collect nor use biometrics data. If you have questions or requests, you may contact our Privacy Officer at the email noted above in the “Contact Us” section.

Vermont: We will not share personal information with non-affiliates except for our own marketing purposes, our everyday business purposes, with your consent or as permitted by law.

Nevada: In accordance with state law we provide you with the following contact information: Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington Ave., Suite 3900, Las Vegas, NV 89101; phone number: 702-486-3132; email: agInfo@ag.nv.gov.

California: This Privacy Policy describes personal information we generally collect, use and disclose about California residents. We do not sell California residents' personal information. The California Consumer Privacy Act (CCPA), as amended on January 1, 2023 by the California Privacy Rights Act (CPRA), permits California residents to (a) ask which categories and pieces of personal information it collects and how the information is used; (b) request deletion or correction of the information; and (c) opt out of the sale of such information, if applicable. These provisions of the CCPA or CPRA (as applicable) do not apply to personal information collected, processed, shared, or disclosed by financial institutions pursuant to federal law. To contact us with questions about our compliance with the CCPA or CPRA submit an e-mail request to privacy@payfare.com with your inquiry. We may ask that you provide certain information to verify your identity. We will respond to your request in accordance with the CCPA or CPRA (as applicable) and if we deny your request, we will provide an explanation. You may designate an authorized agent to make a request under the CCPA or CPRA on your behalf if the authorized agent is a person or business registered with the Secretary of the State of California and you sign a written declaration that you authorize the agent to act on your behalf. Please include a certified copy of your written declaration authorizing the agent to act on your behalf with your e-mail inquiry. You may not be discriminated against because you exercise your rights under the CCPA or CPRA in violation of Cal. Civ. Code §1798.125.