



## Privacy Policy

This policy describes the ways we collect, store, use and protect your personal information. You accepted this policy when you signed up for our Service. We may amend this policy at any time by posting a revised version on our website. The revised version will be effective at the time we post it. In addition, if the revised version includes a substantial change, we will provide you with 30 days' prior notice by posting notice of the change on the "Policy Updates" page of our website.

### How we collect information about you

When you visit the **push2pay** website, we collect your IP address and standard web log information, such as your browser type and the pages you accessed on our website.

If you open an account, we collect the following types of information from you:

- Contact information - your name, address, phone, email, Skype ID and other similar information.
- Financial information - the full bank account numbers and credit card numbers that you link to your **push2pay** account.

Before permitting you to use our Service, we may require you to provide additional information we can use to verify your identity or address or manage risk, such as your date of birth, social security number or other information. We may also obtain information about you from third parties such as credit bureaus and identity verification services.

When you are using our Service, we collect information about your account transactions and we may collect information about your computer or other access device for fraud prevention purposes.

Finally, we may collect additional information from or about you in other ways not specifically described here. For example, we may collect information related to your contact with our customer support team or store results when you respond to a survey.

## **How we use cookies**

When you access our website, we, or companies we hire to track how our website is used, may place small data files called "cookies" on your computer.

We send a "session cookie" to your computer when you log in to your account. This type of cookie helps us to recognize you if you visit multiple pages on our site during the same session, so that we don't need to ask you for your password on each page. Once you log out or close your browser, this cookie expires and no longer has any effect.

We also use longer-lasting cookies for other purposes such as to display your e-mail address on our sign-in form, so that you don't need to retype the e-mail address each time you log in to your account.

We encode our cookies so that only we can interpret the information stored in them. You are free to decline our cookies if your browser permits, but doing so may interfere with your use of our website. We may also collect information about your computer or other access device to mitigate risk and for fraud prevention purposes.

## **How we protect and store personal information**

Throughout this policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been anonymized so that it does not identify a specific user.

We store and process your personal information on our computers in the US, and we protect it by maintaining physical, electronic and procedural safeguards in compliance with applicable US federal and state regulations. We use computer safeguards such as firewalls and data encryption, we enforce physical access controls to our buildings and files, and we authorize access to personal information only for those employees who require it to fulfill their job responsibilities.

## **How we use the personal information we collect**

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. We may use your personal information to:

- provide the services and customer support you request;
- process transactions and send notices about your transactions
- resolve disputes, collect fees, and troubleshoot problems;
- prevent potentially prohibited or illegal activities, and enforce our User Agreement;
- customize, measure, and improve our services and the content and layout of our website;
- send you targeted marketing, service update notices, and promotional offers based on your communication preferences;
- compare information for accuracy and verify it with third parties.

### **How we share personal information with other push2pay users**

To process your payments, we need to share some of your personal information with the person or company that you are paying or is paying you. Your contact information, date of sign-up, the number of payments you have received from verified **push2pay** users, and whether you have verified control of a bank account are provided to other **push2pay** users who you transact with through **push2pay**.

If you are buying goods or services and pay through **push2pay**, we may also provide the seller with your confirmed credit card billing address to help complete your transaction with the seller. The seller is not allowed to use this information to market their services to you unless you have agreed to it. If an attempt to pay your seller fails, or is later invalidated, we may also provide your seller with details of the unsuccessful payment. To facilitate dispute resolutions, we may provide a buyer with the seller's address so that goods can be returned to the seller.

We work with merchants to enable them to accept payments from you using **push2pay**. In doing so, a merchant may share information about you with us, such as your email address, when you attempt to pay that merchant. We use this information to confirm to that merchant that you are a **push2pay** customer and that the merchant should enable **push2pay** as a form of payment for your purchase. Also, if you request that we validate your status as a **push2pay** customer with a third party, we will do so. Please note that merchants you buy from and contract with have their own privacy policies, and **push2pay** may not be held responsible for their operations, including, but not limited to, their information practices.

Regardless, we will not disclose your credit card number or bank account number to anyone you have paid or who has paid you through **push2pay**, except with your express permission or if we are required to do so to comply with a subpoena or other legal process.

### **How we share personal information with other parties**

We may share your personal information with:

- Service providers under contract who help with parts of our business operations; (fraud prevention, bill collection, marketing, technology services). Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.
- Credit bureaus to report account information, as permitted by law.
- Banking partners as required by credit card association rules for inclusion on their list of terminated merchants (in the event that you meet their criteria which includes having **push2pay** close your **push2pay** Account due to your breach of the **push2pay** User Agreement).
- Companies that we plan to merge with or be acquired by. (Should such a combination occur, we will require that the new combined entity follow this privacy policy with respect to your personal information. If your personal information could be used contrary to this policy, you will receive prior notice.)
- Law enforcement, government officials, or other third parties when
  - we are compelled to do so by a subpoena, court order or similar legal procedure
  - we need to do so to comply with law
  - we believe in good faith that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity, or to investigate violations of our User Agreement
- Other third parties with your consent or direction to do so.

**push2pay** will not sell or rent any of your personal information to third parties for their marketing purposes and only shares your personal information with third parties as described in this policy.

If you open a **push2pay** account directly on a third party website or application, any information that you enter on that website or application (and not directly on a **push2pay** website) will be shared with the owner of the third party website or application.

#### **How you can restrict push2pay from sharing your personal information**

Federal and state laws allow you to restrict the sharing of your personal information in certain instances. However, these laws also state that you cannot restrict other types of sharing. Because we have chosen to refrain from certain types of data sharing, the only type of sharing of your personal information that you may restrict is as follows:

#### **How you can contact us about privacy questions**

If you have questions or concerns regarding this policy, you should contact us by writing to us at **push2pay**, Attn: Privacy Department, 400 E. Royal Ln., Suite 201, Irving, TX 75039.