

## Our Privacy Policy

Last Updated: December 19, 2019

Protecting your privacy is very important to us. Therefore, the intent of this policy is to inform you about our collection and use of your personal and nonpersonal information. The policy is applicable to all visitors of this site is entered into between you and PaySpot, LLC d/b/a epay North America, its affiliates, successors and assigns (collectively, “epay”, “we”, “our” or “us”).

By using or navigating the site, you acknowledge that you have read, understand, and agree to be bound by this Privacy Policy. We encourage you to review and check the site regularly for any updates to this Privacy Policy. We will publish the updated version on the site and by continuing to deal with us, you accept this Privacy Policy as it applies from time to time.

### Privacy

epay does not involuntarily collect your personal information when you use this site. You agree that if you provide any personal information to us through this website, we may use this information and disclose it to others for the purpose of responding to your request. We will not disclose personal information to others unless we need to do so to respond to your request.

### How we collect your personal information

We generally collect personal information directly from you, for example, when you register your interest in becoming an epay retailer or if you sign up to receive marketing and promotional information about our prepaid products and/or services. The type of personal information we collect about you is usually limited to your name, mailing address, telephone number and email address. Where relevant, we may ask you for other information, such as business or financial information, for example, in the course of assessing your interest in becoming an epay retailer.

### How we use your personal information

We use your personal information to provide and market our prepaid products and services to you. Your personal information may be used for purposes of providing you with information on products and services offered by third parties as well as our own products and services. We may also use your personal information for invoicing purposes if you are an epay retailer. We do not disclose your personal information to third parties for purposes of allowing them to directly market their products and services to you.

We are a company within the Euronet group of companies and may share your personal information with our affiliates who will only use and disclose your personal information for the purposes for which it is collected as stated above. This may potentially involve sending your personal information overseas.

### Security of your personal information

We secure and protect any personal information that we hold from misuse, loss or unauthorized use or disclosure.

A visit to our site can result in the storage on our server of information about the access (date, time, page accessed). This does not represent any analysis of personal data (e.g., name, address or e-mail address). If personal data is collected, this only occurs as provided in these terms and conditions or with the prior consent of the user of the site. Any forwarding of the data to third parties without the express consent of the user shall not take place, except as otherwise provided in these terms and conditions.

You are advised that the transmission of data via the Internet (e.g., by e-mail) can offer security vulnerabilities. It is therefore impossible to safeguard the data completely against access by third parties. We cannot assume any liability for damages arising as a result of such security vulnerabilities.

The use by third-parties of all published contact details for the purpose of advertising is expressly excluded. We reserve the right to take legal steps in the case of the unsolicited sending of advertising information (i.e., spam mail). Our systems are protected from unwanted external access.

## California Consumer Privacy Act Rights

As of January 1, 2020 verified California residents will have the right to:

- request and receive disclosure of our personal information collection practices during the prior 12 months, including the categories of personal information we collect, the categories of sources of such information, our business purpose for collecting or sharing such information, and the categories of third parties with whom we share such information.
- request and receive a copy of the personal information we have collected about them during the prior 12 months.
- request and receive disclosure of our information sharing practices during the prior 12 months, including a list of the categories of personal information sold with the category of third party recipients and a list of the categories of personal information that we disclosed for a business purpose.
- request that we not sell personal information about them; and
- request that we delete (and direct our service providers to delete) their personal information subject to certain exceptions.

For purposes of the CCPA personal information means information that identifies, relates to, describes, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular California resident or household.

In order to make a request for disclosure, California residents may contact us by calling epay customer service at 1-800-983-9385, emailing epay customer service at [customerservice@us.epayworldwide.com](mailto:customerservice@us.epayworldwide.com) or by clicking [here](#). We will ask you for information that allows us to reasonably verify your identity (that you are the person about whom we collected personal information) and will use that information only for that purpose. We may request that you submit a signed statement under penalty of perjury that you are the individual you claim to be. We will acknowledge receipt of your request within 10 days and will endeavor to respond within forty-five days of receipt of your request, but if we require more time (up to an additional forty-five days) we will notify you of our need for additional time. For requests that we not sell your information we will

comply with your request within 15 days. We cannot respond to your request or provide you with personal information if we cannot verify your identity and confirm that the personal information relates to you.

You may make a request for disclosure of our information collection practices, the information we collected about you, or our sharing practices up to twice within a 12-month period. You may make a request that we not sell information or for deletion of your information at any time.

For requests for a copy of the personal information we have collected during the 12 months prior to your request we will endeavor to provide the information in a format that is readily useable, including by mailing you a paper copy or providing an electronic copy to your registered account, if you have registered an account with us.

For requests for deletion of your information please understand that California law permits us to retain certain information and not to delete it under certain circumstances. By way of example, we are not required to comply with a request to delete information if the information is necessary for us to complete a transaction for you or otherwise perform a contract; to detect, protect against, or prosecute security incidents, fraud or illegal activity; to use the information only internally in ways reasonably aligned with your expectations as our customer (such as maintaining sales records), and to comply with legal obligations. If we receive such a request from you we will notify any service providers we have engaged to delete your information as well.

We will not discriminate against you as a result of your exercise of any of these rights.

**Selling Information.** We do not sell your information for monetary consideration and we do not disclose your information for other valuable consideration. If, in the future, we enter into arrangements that fall within the definition of a “sale” under the CCPA, we will update this privacy policy and our compliance with the CCPA.

**Using an Authorized Agent.** You may submit a request through someone holding a formal Power of Attorney. Otherwise, you may submit a request using an authorized agent only if (1) you provide the authorized agent with written permission to make a request and (2) you verify your own identity directly with us. We will require the agent to submit proof to us that they have been authorized to make requests on your behalf.

During the past 12 months, we have collected the following categories of information from the listed sources, used it for the listed business purposes and shared it with the listed categories of third parties. The categories of information include information we collect from our website visitors, registered users, employees, vendors, suppliers and any other person that interacts with us either online or offline. Not all information is collected about all individuals. For instance, we may collect different information from applicants for employment or from vendors or from customers.

<b>Category of Information collected</b>	<b>Source</b>	<b>Business purposes* for use</b>	<b>Categories of third parties receiving information</b>
Identifiers (name, alias, postal address, email address, phone number, fax number,	Individuals submitting	Performing services for you;	Affiliated companies.

account name, Social Security number, driver's license number, passport number, unique personal identifier, IP address)	information to us; and  information we automatically collect from site visitors.	ad customization;  internal research and development; and  quality control.	
Sensitive Information (name with financial account or username and password)	Individuals submitting information.	Performing services for you;  security detection, protection and enforcement; functionality debugging, error repair;  internal research and development; and  quality control.	Affiliated companies.
Commercial information (transaction history, products/services purchased, obtained or considered)	Individuals submitting information; and  information we automatically collect from site visitors.	Auditing relating to transactions;  ad customization;  performing services to you;  internal research and development; and  quality control.	Affiliated companies.

\*More specifically, the business purposes include:

1. Performing services for you:
  - To administer or otherwise carry out our obligations in relation to any agreement to which we are a party;
  - To assist you in completing a transaction or order;
  - To allow tracking of shipments;
  - To prepare and process invoices;
  - To respond to queries or requests and to provide services and support;
  - To provide aftersales customer relationship management;
  - To create and manage our customer accounts;

- To notify you about changes to our services and products; and
  - To provide you information regarding our products and services.
2. Advertising customization:
- For marketing and promotions we believe you may find of interest and to provide you with information about products and services that may interest you.
3. Auditing relating to transactions, internal research and development:
- To provide for internal business administration and operations; and
  - To create products or services that may meet your needs.
4. Security detection, protection and enforcement; functionality debugging, error repair:
- As part of our efforts to keep our Sites safe and secure; and
  - To ensure the security of your account and our business, preventing or detecting fraud, malicious activity or abuses of our Sites, for example, by requesting verification information in order to reset your account password (if applicable).
5. Quality control:
- To monitor quality control and ensure compliance with our legal obligations, codes and ordinances, policies and procedures; and
  - To develop and improve our products and services, for example, by reviewing visits to the Sites and various subpages, demand for specific products and services and user comments.