

SIMPLEPAY

Privacy Policy

SimplePay provides electronic payments, bill presentment and payment services for organizations around the world. SimplePay takes the privacy of your personal information very seriously and is committed to protecting your privacy.

SimplePay, and its entities covered by the Privacy Shield certification and are committed to gaining and maintaining your trust by following a core set of principles:

- **Transparency:** We provide clear notice of privacy practices through a privacy statement so you can make informed decisions about data collection and use.
- **Lawful processing:** We process your personal information in a fair and lawful manner.
- **Choice:** If you choose to share personal information with us, SimplePay will identify any options you have for controlling the use of this information at the time it is collected. You are also given the opportunity to opt out of email or text messages by following the instructions contained in any such message.
- **Access:** SimplePay allows you to request access, request that we update your personal information or request that personal information you have provided through our products and services be disabled or forgotten.
- **Security:** We will protect the data you entrust to us through strong security and encryption. We limit access to personal information and do not store personal information longer than is necessary.
- **Accountability:** SimplePay responds to user inquiries, participates in industry programs, and has adopted privacy practices that are consistent with applicable country, state, and local data protection laws

Privacy Statement

This Privacy Statement explains what personal data SimplePay ("SimplePay" or "we" or "us") collects from you, through our interactions with you and through our website, products or services, and how we use it. It also describes your choices regarding use, access and correction of your personal information.

Your privacy is important to us. To protect your privacy, we provide this Privacy Statement explaining our information practices and the choices you can make about the way your information is collected and used. Please read this Privacy Statement carefully to understand what we do and the choices you can make.

To facilitate our operations, we may transfer, store and process your personal information in jurisdictions other than where you live, including in the United States. Laws in these countries may differ from the laws applicable to your country of residence. For instance, if you are a European Economic Area (EEA) data subject and your personal information is shared with our affiliates, partners, or third-party service providers acting on our behalf outside of the EEA, then it is done so pursuant to necessary means to ensure an adequate level of protection.

SimplePay adheres to the principles of the EU-U.S. and Swiss-U.S. Privacy Shield frameworks. SimplePay is committed to subjecting all personal data received from European Union (EU) member countries and Switzerland, respectively, in reliance on the Privacy Shield Framework, to the Framework's applicable Principles. To learn more about the Privacy Shield Frameworks, visit the U.S. Department of Commerce's Privacy Shield List at <https://www.privacyshield.gov/list>.

SimplePay is responsible for the processing of personal data it receives, under the Privacy Shield Framework, and subsequently transfers to a third party acting as an agent on SimplePay's behalf.

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SimplePay complies with the Privacy Shield Principles for all onward transfers of personal data from the EU and Switzerland, including the onward transfer liability provisions.

With respect to personal data received or transferred pursuant to the Privacy Shield Frameworks, SimplePay is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. In certain situations, SimplePay may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements.

To provide the services and to reduce the risk of fraud, SimplePay may ask you for personal information. This Privacy Statement describes the personal information we collect from you, and how we use that information. We will use your personal information only in accordance with the terms of this Privacy Statement. We will not sell or rent your personal information or provide a list of our customers to third parties. However, there are limited circumstances in which some of your information will be shared with third parties under strict restrictions, so it is important for you to review the details of this Privacy Statement.

This Privacy Statement applies to all services that are offered by SimplePay and to personal information that we maintain about current and former customers.

Your access to and use of our web sites are subject to this Privacy Statement and any other Terms of Use or policies posted by us. If you have questions or concerns regarding this Privacy Statement, you should contact us by emailing info@simplepaygroup.com.

Collection and use of your personal information

What types of information do we collect, use and store?

The types of personal information we collect, use and store depend on the product or service you have with us. This may include the following information collected from you and from your transactions with us or our customers with whom you have a direct relationship:

- Your name, mailing address, city, state, zip code, email address, phone number and IP address
- Your bill payment (including payment amount and designated payee)
- Your credit or debit card or bank account numbers, expiration date, and cardholder or account holder name
- Social Security Number (SSN), passport number, and/or employer identification number (EIN)
- Unique identifier such as username, account number, and password
- Technical data such as IP address

We also collect aggregate information which does not identify you.

This information can be collected directly from you or through our customers with whom you have a direct relationship such as a merchant or financial institution. We must collect information about you in order to create the account or to facilitate the processing of your payment transaction.

Since certain information is required if you choose to register or make a payment transaction, you agree to provide accurate and complete information when providing personal information. Except as otherwise provided below under the heading "How do we use your information?", when you supply information about yourself for a specific purpose, we use that information only for the specified purpose and to manage internal operations and security. In general, you can visit our web site without

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telling us who you are or revealing any personal information about yourself.

However, some portions of our web site are accessible only to users who have registered with us.

At times we may ask you for contact information or conduct online surveys to better understand your needs, to provide you with enhanced services, and to help you use the services more effectively. If you participate on our online surveys, we will request certain personal information such as name, email address, and demographic information such as zip code. Participation in these surveys or contests is completely voluntary and you therefore have a choice whether or not to disclose this information. We will not share the personal information you provide through a survey with other third parties unless we give you prior notice and choice.

We also display personal testimonials of satisfied customers on our site in addition to other endorsements. With your consent we may post your testimonial along with your name. If you wish to update or delete your testimonial, you can contact us by emailing info@simplepaygroup.com.

How do we use your information?

Internal Uses

We will only use your personal information:

- 1) in the performance of a contract;
- 2) when processing the personal information is in our legitimate interest, and that interest is not outweighed by your own interests;
- 3) when obligated by law or it is in the public interest; or
- 4) when you have given consent.

We use the information we collect about you for everyday internal business purposes to provide our services, process your transactions, maintain your account(s), and provide customer service. We provide access to personal information of our customers only to those employees

who require it as part of their job to provide our services, process customer payments, and provide customer service.

We may use your personal information for the purposes of marketing products and services from SimplePay or those of our partners. Those services may include contacting you via email or direct mail about opportunities related to our products or services, as well as to perform marketing analytics.

You may exercise choice to discontinue receipt of these opportunities at any time by by emailing info@simplepaygroup.com.

As part of our fraud prevention product and service offerings, merchants and financial institution clients with whom you have a direct relationship with may elect to utilize auto-decisioning functionality. For instance, if a card present transaction was initiated in a country in which you are not visiting or do not reside, the transaction may be declined. Automated decisions utilize information only when it is required in connection with a contract or required by law. You may contact the merchant or financial institution with whom you have the direct relationship or contact our Data Protection Officer for more information on the auto decision process.

Disclosure to Third Parties

SimplePay shares certain personal information to run our everyday business. SimplePay does not sell or rent any of your personal information. SimplePay will not share any of your personal information with third parties except in the circumstances described below or with your permission.

We may share your personal information with our business partners, service vendors, suppliers, or other authorized third-party contractors who provide services or perform marketing or other functions on our behalf to provide a requested service or transaction. We will only provide these third parties with the minimum amount of personal information

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necessary to complete the requested service or transaction. We will require that these third parties keep your personal information confidential and not use your personal information except for the limited purpose of completing the requested service or transaction.

We disclose personal information with third parties that we believe it is appropriate to cooperate with in investigations of suspected fraud or other illegal activity. This would include situations involving potential threats to the physical safety of any person, or to conduct investigations of violations of SimplePay's Terms of Use, or as otherwise required by law.

We will disclose your personal information when we are obliged by law to do so or when we suspect fraudulent or criminal activities. A variety of federal, state, and local laws or government regulations may require us to disclose non-public personal information about you to respond to court orders or legal investigations. In these instances, we will make commercially reasonable efforts to release only the information required by law, subpoena, legal process, or court order.

We may also disclose your personal information when otherwise permitted by applicable privacy laws when disclosure is needed to enforce our rights arising out of any agreement, transaction, or relationship with you.

We share required information with your agent or legal representative such as the holder of a power of attorney that you grant, or a guardian appointed for you.

We share aggregated statistical or demographic data from specified accounts with our business partners or for public relations and marketing purposes. For example, we may reveal the percentage of payments with a credit card versus a checking account. It is important to note however, that this aggregated information

is not tied to any personal information that can identify you.

As with any other business, it is possible that in the future SimplePay could merge with or be acquired by another company. If such an acquisition occurs, the replacement company would have access to personal information maintained by SimplePay. This will include customer and personal account information, but it will continue to be bound by this Privacy Statement unless and until it is amended. You will be notified via a prominent notice on our sites on any such change in ownership or control of your personal information.

We make disclosures to third party partners as permitted by federal or state law. If you have registered with our service and indicated you want to receive communications from us, SimplePay may contract with third parties for the purposes of marketing products and services of SimplePay or those of our partners. SimplePay may also disclose personal information to financial service providers with which it has joint marketing agreements. These are formal agreements between unaffiliated third parties that are combined to market products or services to you. SimplePay will require such third parties to maintain confidentiality of your personal information.

When you provide personal information to us, we may continue to store and maintain that information for as long as necessary. If you want us to stop storing your personal information, you may request that we do so by emailing info@simplepaygroup.com.

Access and Changes to Personal Information (PI)

You have the right to amend or update inaccurate or incomplete personal information, request deletion of your personal information, or request that we no longer use it. Upon request SimplePay will provide you with information about whether we hold any of your personal

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information. If you have submitted incorrect personal information through our sites and would like to revise this information or if you would like to request access of your personal information, please contact us by submitting this request form. Please do not send us your personal information(PI) via email. We will respond to your request to access within a reasonable timeframe in compliance with law.

We will retain your information for as long as your account is active or as needed to provide you with services. In addition, we will maintain and use your information for as long as necessary to comply with our legal obligations, resolve disputes, and administer our agreements.

If you want to cancel your account or request that we no longer use your information to provide you with any services, contact us by emailing info@simplepaygroup.com

Use of Cookies

SimplePay uses cookies and similar technologies for several purposes, depending on the product, including:

- Storing your Preferences and Settings. Settings that enable our website to operate correctly or that maintain your preferences over time may be stored on your device. For example, we save preferences, such as language, browser and multimedia player settings, so those do not have to be reset each time you return to the site. If you opt out of interest-based advertising, we store your opt-out preference in a cookie on your device.
- Sign-in and Authentication. When you sign into a website using your personal SimplePay account, we store a unique ID number, and the time you signed in, in an encrypted cookie on your device. This cookie allows you to move from page to page within the site without having to sign in again on each page. You can

also save your sign-in information so you do not have to sign in each time you return to the site.

- Security. We use cookies to detect fraud and abuse of our websites and services.
- Social Media. Some of our websites include code snippets provided by social media companies that can sense if you are already logged into a given social media account so you can easily share SimplePay content with other social media users via that account. These code snippets read cookies set previously by social media company web content while you are logged in and browsing such content on those social media sites.
- Interest-Based Advertising. SimplePay uses cookies to collect data about your online activity and identify your interests so that we can provide advertising that is most relevant to you. You can opt out of receiving interest-based advertising from SimplePay as described in the Preferences and opting-out section of this privacy statement.
- Analytics. To provide our products, and improve your user experience on our website, we use cookies and other identifiers to gather usage and performance data. For example, we use cookies to count the number of unique visitors to a web page or service and to develop other statistics about the operations of our products. This includes cookies from SimplePay and from third-party analytics providers.
- Performance. SimplePay uses cookies for load balancing to ensure that websites remain up and running.

How to Control Cookies

Most web browsers automatically accept cookies but provide controls that allow you to block or delete them. For example, in most modern browsers, you can block or delete cookies by clicking Settings > Privacy > Cookies. Instructions for blocking

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or deleting cookies in other browsers may be available in each browser's privacy or help documentation.

Certain features of SimplePay products depend on cookies. Please be aware that if you choose to block cookies, you may not be able to sign in or use those features, and preferences that are dependent on cookies may be lost. If you choose to delete cookies, settings and preferences controlled by those cookies, including advertising preferences, will be deleted and may need to be recreated.

Opting Out of Analytics Services

You can opt out of data collection or use by some third-party analytics providers by clicking the following links:

- AppsFlyer: www.appsflyer.com/optout
- Flurry Analytics: <https://aim.yahoo.com/aim/us/en/optout/>
- Google Analytics: tools.google.com/dlpage/gaoptout (requires you to install a browser add-on)
- Kissmetrics: kissmetrics.com/user-privacy
- Mixpanel: mixpanel.com/optout
- Nielsen: www.nielsen-online.com/corp.jsp?section=leg_prs&nav=1#Optoutchoices
- Omniture (Adobe): www.d1.sc.omtrdc.net/optout.html
- Visible Measures: www.visiblemeasures.com/viewer-settings-opt-out
- WebTrends: ondemand.webtrends.com/support/optout.asp

Log files

Like many web sites, we may automatically gather, or engage a third party to gather, certain data about our site's traffic and store it in log files. For this purpose, we use Internet Protocol (IP) addresses to analyze trends, execute the web sites, track our users' activities, and gather broad demographic information for aggregate

use. We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality.

Local Storage

We use Local Storage, such as HTML5, to store content information and preferences. Third parties with whom we partner to provide certain features on our website or to display advertising based upon your web browsing activity also use HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5. Preferences and opting-out

You may inform SimplePay of your preferences concerning the use of your information by "opting-out" of the following practices by emailing info@simplepaygroup.com.

If you gave SimplePay permission to contract with third party marketing partners working on behalf of SimplePay for the purpose of marketing products or services to you and no longer want to enable SimplePay to do so, you can "opt-out" of our sharing your information with third party partners for marketing purposes.

If you requested but no longer want SimplePay to inform you of upcoming payment obligations, notify you of a scheduled or successfully completed Auto Payment, or notify you of new or additional services offered by us from which you may benefit, you can "opt-out" from receiving this information.

If you received commercial email from SimplePay and you do not want to receive any unsolicited commercial emails in the future, you can "opt-out" from receiving commercial email from SimplePay by using the unsubscribe link found in the emails or by emailing info@simplepaygroup.com.

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SimplePay does not disclose private email communications that are transmitted using SimplePay services except as described in this Privacy Statement and as required to provide requested services or to reply to your email. In the ordinary course of our business, we may use the contact information you provide us to confirm a payment transaction and/or to alert you concerning any problems we may experience in attempting to process your payment

If you registered with a service on our sites to "opt-in", you may receive information about new or additional services, other notifications, or information from SimplePay or our partners.

SMS Text Messaging

For certain applications, we can send a SMS text message for payment confirmation and other messages to your mobile phone number. Once you provide us with your mobile phone number (message and data rates may apply), you will receive a text message from us to complete the setup process. By replying to the text message, you will be confirming in writing that you have agreed to receive text messages containing information such as payment confirmations, bill reminders and other relevant messages, including information to inform you of new or additional services offered by us from which you may benefit. Message frequency depends upon your payment activity and other information such as your geographic location that we may use to send you messages relevant to our services available in your area.

To opt-out at any time, respond to the text with OPT-OUT. If you cancel, we will send you a text message to confirm we have processed your cancellation. When you opt-out of receiving text messages, it does not affect the other services which are provided on our websites. For additional assistance, email info@simplepaygroup.com.

Text messaging is not available in all areas. Not all mobile phones have SMS text capability.

Children

SimplePay recognizes the importance of children's safety and privacy on the Internet. For this reason and to comply with certain laws, we do not intentionally collect personal, individually identifiable information from children under the age of 13, nor do we offer content targeted to children under 13.

Security

The security of your information is very important to us. We take commercially reasonable precautions consistent with applicable regulatory requirements and applicable published security standards to protect the personal information submitted to us. However, no method of transmission over the Internet or method of electronic storage is 100% secure. While we strive to use commercially reasonable means to protect your personal information, we cannot guarantee absolute security. When doing business with others such as advertisers to whom you can link from our site, you should consider the separate security and privacy policies of those other sites. When you enter personal information (such as a credit card number), we encrypt the transmission of that information by using best industry practices as outlined by the Payment Card Industry Data Security Standard (PCI DSS). In the event that your sensitive personal information is accessed by an unauthorized individual and the misuse of your information is reasonably possible, we will notify you of the unauthorized access unless a law enforcement agency believes that such notification may interfere with a criminal investigation. The notification of such an event may be given to you by email or writing at our sole discretion.

If you have any questions about security on our web sites, please contact:

Attn: Risk and Compliance
SimplePay
S6, 2-5 Giffnock Avenue Macquarie Park NSW
2113 Australia

Or by email: info@simplepaygroup.com