

REMITTER USA INCORPORATED PRIVACY POLICY

Remitter USA Incorporated (“we” or “us”) developed this Privacy Policy to explain to you how we manage personal data provided to us in connection with our customers’ access to and use of the Remitter platform, including related tools, applications, and services. We strive to collect personal information only to the extent reasonably necessary to provide services or products to our customers.

Our website and the Remitter platform are not designed for children. We do not knowingly collect any information from children under the age of 16.

Information We Collect

The types of personal data that we maintain about you may include:

- Personal details, such as your name, date of birth, physical location, language preference, family details, and other such information;
- Contact information, such as your email address, telephone and facsimile numbers, residential, business, and postal addresses, and other contact information;
- Financial information, such as debts that you may owe to our customers, bank or payment card details or other information used by our customers to transact with you, and other information that allows us to provide our customers with the Remitter platform for debt management;
- Statistical information about your online habits and interactions with Remitter; and
- Technical information, such as your IP address, computer, network, and browser.

How We Collect Information

We collect most of our information from our customers who use the Remitter platform for debt management. We may collect personal information from you when you contact or otherwise interact with us. We collect statistical and technical information based on our interactions with you, or your interactions with our customers or the Remitter platform. We may also collect information about you from other sources such as social media, public records, and our business partners.

We use pixel tags to enable our customers to send messages to you in a format that you can read. The pixel tags can also tell our customers whether a message to you has been opened. When you access the Remitter platform or contact us through the internet, we may collect information using cookies or through the use of analytical services, such as Google analytics.

How We Use Your Information

Remitter collects, holds, uses, and discloses personal information to provide products or services to our customers and to enable you to manage your affairs with our customers.

We may also collect, hold, use, or disclose personal information to enable us to operate our business, which may include:

- developing and communicating our marketing and promotions to customers, current and prospective;
- developing and improving our products, client service, and relationships;
- investigating into any complaints about our customers or if we have reason to suspect that our customers are in breach of any of our terms and conditions governing access to or the use of Remitter platform or have otherwise engaged in any unlawful activity; and
- as required by law.

We also collect, hold, use, or disclose personal information to allow our customers:

- To verify your identity;
- To communicate with you about:
 - your affairs with our customers;
 - the Remitter platform;
 - your inquiries or complaints.

We rely upon our legitimate interest and the performance of a contract as our legal bases for processing your personal data. We generally do not rely on your consent as a legal basis.

How We Use Cookies

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic or lets you know when you visit a particular site. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes, and dislikes by gathering and remembering information about your preferences.

We collect personal information from you by using cookies on our website. This information helps us analyze data about web page traffic and us tailor our website to your needs and the needs of our customers.

A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can adjust your browser setting to accept or reject cookies.

Google Analytics

Google Analytics is a web analysis service provided by Google Inc. ("Google"). Google tracks usage data related to Remitter and may share such data with other Google services. Google may use the data collected to contextualize and personalize the ads of its own advertising network. The data is processed in the United States.

To access Google's privacy policy, visit <https://policies.google.com/privacy?hl=en>. To opt out of Google Analytics tracking for the web, visit <https://tools.google.com/dlpage/gaoptout/>.

How We Share Your Information

We may disclose your personal information to third parties providers of business or administrative services, such as file storage services, database and mailing services, cloud hosting services, marketing services, identity verification services, and other information technology services. We may also disclose your personal information to our professional advisors and agents.

When our customers provide personal information about you to us, they are able to access such information as the master record holder for the purposes of the Remitter platform. We may disclose your personal information to third parties to assist us in providing the best possible service to our customers. We limit third party access personal information to the extent reasonably necessary for us to deliver services our customers, or where required by law. We take reasonable steps to ensure that such third parties protect the privacy of your personal information.

How Long We Keep Your Information

We will retain your personal information for a reasonable amount of time, as allowed by the law. Thereafter, we will take reasonable steps to destroy or permanently anonymize such information in accordance with applicable laws.

How We Protect Your Information

We take all reasonable steps to protect your personal information from unauthorized access, modification or disclosure, including misuse, interference, and loss. We secure such information in accordance with industry standards.

We use encryption to transfer personal information; however, the security of online transactions and communications sent electronically and by US Mail cannot be guaranteed. Our customers provide information to us at their own risk.

We are not responsible for the privacy or security practices of any third party, including our customers and any third parties to whom we disclose personal information. The collection, use, storage, and disclosure of your personal information by such third parties is subject to their own privacy and security policies.

We may make links available to you to access websites that are not under our control. Links to external websites are provided solely for your convenience. The owners or operators of such websites maintain their own policies regarding privacy and terms of use, and they are solely responsible for the content of their websites. We disclaim any responsibility for linked websites that are not under our control.

If you suspect any misuse or loss of, or unauthorized access to their personal information, please let us know immediately by contacting our Privacy Officer using the information provided below.

Your Legal Rights

The Data Protection Act provides you with legal rights relating to your personal data. These rights permit you to request:

- access to your personal data.
- correction of your personal data.
- deletion of your personal data.
- a description of your personal data.

We strive to ensure that any personal information that we collect and hold is accurate, complete, and up to date. Our customers are responsible for providing us with accurate and truthful personal information, and for properly updating such. We cannot be liable for any information provided to us that is inaccurate, incomplete, or outdated. If you believe that the personal information that we hold is inaccurate, incomplete, or outdated, please our Privacy Officer using the information provided below. We will give you access to our customers to correct your personal information, unless there is a lawful reason for refusing the request for access or correction. If we refuse a request from a customer, we will provide a written notice explaining our reasons for that refusal, and how the customer may complain about that refusal.

Complaints and Disputes

If you have a complaint about our handling of your personal information, you should address your complaint in writing to the Privacy Officer, using the information provided below. Complaints should set out the details of the complaint and your contact information. Remitter's Privacy Officer will investigate the issue and respond to you in writing.

Privacy Notice Changes

We reserve the right to amend this Privacy Policy at any time and for any reason. The date of the last revision to this Privacy Policy is indicated by the Effective Date listed below. We recommend that you revisit this Privacy Policy periodically to review any changes in our practices. The continued use of the Remitter platform by you or our customers constitutes agreement with this Privacy Policy, as amended from time to time.

Contacting Us

Our customers are the data controllers for personal data uploaded to the Remitter platform. Remitter USA Incorporated is the processor with respect to such information.

Remitter USA Incorporated is data controller responsible for personal data that we collect from sources other than our customers.

Please contact us at any time with questions about our privacy practices or to request access to view, correct, or delete information that we have about you, by mail directed to:

Remitter USA Incorporated
Attn: Privacy Officer
1805 N. Scottsdale Rd., Ste. 100 Tempe, AZ 85281

by email directed to legal@remitter.com, or by telephone at +1 (813) 205-0466.

Effective Date: July 5, 2018