

PAY TGTHR, INC.

Privacy Policy

Last updated: March 6, 2021

You can see our previous Privacy Policies [here](#).

This Privacy Policy (the “**Privacy Policy**”) serves to inform you of our policies and procedures regarding the collection, use and disclosure of the information we receive when you access and use the website (the “**Site**”), services, software, mobile or desktop applications, content, and all other products and services (all of the foregoing collectively, the “**Services**”) owned, controlled or offered, directly or indirectly, by Pay Tgthr, Inc. (together with its subsidiaries and affiliates, “**Pay Tgthr**”, “**we**,” “**our**” or “**us**”). Pay Tgthr believes that the privacy of its users is paramount and strives to use Personal Information (as defined below) only in ways outlined in this Privacy Policy. The Privacy Policy is incorporated by reference into our Terms of Service, currently available at <https://paytgthr.com/legal/termsofservice.pdf> (the “**Terms of Service**”). Any terms used herein and not defined will have the meanings given to them in the Terms of Service. By using the Services, you hereby warrant and represent that you have read, understand and agree to this Privacy Policy and the Terms of Service, that you are a resident of the United States and that you are over 18 years of age. PLEASE DO NOT USE, INSTALL OR ACCESS THE SERVICES IF YOU DO NOT AGREE TO THIS PRIVACY POLICY.

1. What We Mean by Personal Information

For purposes of this Privacy Policy, “**Personal Information**” means any information from or about a person that either identifies that person directly or that makes that person identifiable when it is combined with other information from or about that person from any source. This Privacy Policy does not cover the practices of companies that we do not own or control or people we do not manage. Therefore, this policy does not apply to the practices of third-party websites, services or applications, including third parties with which we may partner.

2. Information We Collect

Information You Provide To Us

When you use the Services or otherwise communicate with us, we collect information that you provide to us directly. For example, we collect information in the following circumstances: you (i) use our mobile or desktop apps or visit the Site; (ii) register for the Services or create an account or profile or accept the creation of an account or profile on your behalf (an “**Account**”); (iii) access the Services through social networking sites or third party services; (iv) subscribe to newsletters; (v) purchase a product or service on the Site or in our mobile or desktop apps; (vi) invite your friends to join the Services, “share” the Services on social networking sites or perform other similar actions; (vii) request technical support; (viii) otherwise use our mobile or desktop apps or online Services where Personal Information is required for such use and/or participation; and (ix) when you contact us via the Site or when you otherwise communicate with us. You can choose not to provide information that is requested of you by us; however, this may limit your ability to use or access the Services.

The information you provide to us directly may include, without limitation, the following information that may, alone or in combination with other data, constitute Personal Information:

- Information you provide in connection with registering an Account, signing up for a Pay Tgthr Debit Mastercard (as that term is defined in our Terms of Service), or using the Services, including information that can be used to identify you, such as your name, e-mail, residential address, social security number, phone number, and date of birth. In addition, we may collect financial information (including bank account number, routing number or other financial information), and any other information you decide to provide. If any traditional identifier you provide at sign-up is mistaken or otherwise unverifiable, we may collect your Personal Information from an identity service and ask you to verify it. In the course of your use of the Services, you may correct or update your information collected at account opening. In certain circumstances, Pay Tgthr may require that you provide, in addition to the information above, any or all of the following information: government-issued photo ID, such as a driver's license or passport, photographs of you, or proof of address documentation, such as a utility bill;
- Information you provide via e-mail, through the "Contact" section on the Site or by using the contact details listed on various parts of the Site, including your name, company name, e-mail, phone number, bank information, inquiry, and any other information you decide to provide;
- Information you provide in order to subscribe to our newsletters and updates, including your e-mail address, the topic for which you wish to receive updates, or any other information you decide to provide us with. You may always unsubscribe from these e-mails by following the instructions included;
- If you are one of our customers, suppliers or prospects, we may process limited Personal Information in the course of our business relation with you, for example when you place an order, request a demo or vice versa. Such Personal Information may include your name, company, title, e-mail address, telephone number, address, order details, and where applicable and relevant, credit registrations and credit limits; and
- Any other information you may want to share with us, such as Personal Information related to recruitment / job applications.

Moreover, if you contact us, a record of such correspondence may be kept.

Additionally, if another user refers you to us by providing us with your e-mail address, we may send you a message so notifying you as well as our newsletter, information regarding our Services and other communications.

Automatically Collected Information

Most of the data we collect in and through the Site and the Services is technical in nature and is collected and processed automatically through so-called application programming interfaces, software development kits, cookies and similar software-based technologies. Alone or in combination with other data, such automatically collected data may constitute Personal Information. The data we may collect by automated means may include, without limitation:

- Device data: including, but not limited to, data on device advertising ID's and similar hardware qualifiers, device model and manufacturer, operating system version, cellular provider, and precise location data.

- Usage data: including, but not limited to, search terms entered and pages viewed.
- Network and internet information: including, but not limited to, URLs, Internet Protocol (“IP”) addresses, bounce rates, use of spoofing, active (TCP/IP) ports, number of sessions initiated, click streams, location information and network/Wi-Fi access points.
- Actions taken in our mobile and desktop apps and the Site.
- Information we collect on the use of the Site via cookies: please see the “How We Use Cookies and Other Technologies” section below for more information.

We may use, depending on the Services, (i) location based on the IP address presented by you, (ii) network-based geo-location data based on proximity of network towers or the location of Wi-Fi networks, and/or (iii) geo-location data based on coordinates obtained from a mobile device’s GPS radio and location services. Your GPS geo-location is accessed in accordance with your device settings. If location services are enabled on your mobile device and/or a mobile application in connection with the Services, certain of the Services will passively and automatically send location information to Pay Tgthr in order for us to deliver location-specific information on your device, compile your individualized timeline, and aid in fraud detection and prevention. Please note that disabling location service will not anonymize data already collected and uploaded to our servers.

Google Analytics is an element of the Site. By using cookies, Google Analytics collects and stores data such as time of visit, pages visited, time spent on each page of the Site, the Internet Protocol address, and the type of operating system used in the devices used to access the Site. By using a browser plugin available at <http://www.google.com/ads/preferences/plugin/> provided by Google, you can opt out of Google Analytics.

Information You Post on the Services

The Services may provide chat, forum or bulletin board tools to users and the ability to create an “avatar” or other customized profile and Account information. Information that you provide through the use of these tools will be available to the public generally. Pay Tgthr has no obligation to keep private any information that you disclose to other users or the public using these functions. You should exercise caution when deciding to disclose Personal Information through the use of these tools or functions. We strongly recommend that you do not post any information through the Services that allows strangers to identify or locate you or that you otherwise do not want to share with the public.

Information You Share on Third Party Websites or through Social Media Services

The Services may include links to third-party websites and social media services where you will be able to post comments, stories, reviews or other information. Your use of these third-party websites and social media services may result in the collection or sharing of information about you by these third-party websites and social media services. We encourage you to review the privacy policies and settings on the third-party websites and social media services with which you interact to make sure you understand the information that may be collected, used, and shared by those third-party websites and social media services.

How We Use Cookies and Other Technologies

Some of the features on the Site and the Services require the use of “cookies” - small text files that are stored on your device’s hard drive. We use cookies to measure which pages are being accessed, and which features are most frequently used. This enables us to continuously improve the Site to meet the needs of our visitors.

The following sets out how we may use different categories of cookies and your options for managing cookie settings:

Type of Cookies	Description	Managing Settings
Required cookies	Required cookies enable you to navigate the Site and use their features, such as accessing secure areas of the Site and using the Services. If you have chosen to identify yourself to us, we use cookies containing encrypted information to allow us to uniquely identify you. These cookies allow us to uniquely identify you when you are logged into the Site and to process your online transactions and requests.	Because required cookies are essential to operate the Site, there is no option to opt out of these cookies.
Performance cookies	These cookies collect information about how you use our Sites, including which pages you go to most often and if they receive error messages from certain pages. These cookies do not collect information that individually identifies you. Information is only used to improve how the Site function and perform. From time-to-time, we may engage third parties to track and analyze usage and volume statistical information relating to individuals who visit the Site. We may also utilize Flash cookies for these purposes.	To learn how to opt out of performance cookies using your browser settings, click here . To learn how to manage privacy and storage settings for Flash cookies, click here .
Functionality cookies	Functionality cookies allow our Sites to remember information you have entered or choices you make (such as your username, language, or your region) and provide enhanced, more personal features. These cookies also enable you to optimize your use of the Site after logging in. These cookies can also be used to remember changes you have made to text size, fonts and other parts of web pages that you can customize. We may use local shared objects, also known as Flash cookies, to store your preferences or display content	To learn how to opt out of functionality cookies using your browser settings, click here . To learn how to manage privacy and storage settings for Flash cookies, click here .

	based upon what you view on the Site to personalize your visit.	
Targeting or advertising cookies	From time-to-time, we may engage third parties to track and analyze usage and volume statistical information from individuals who visit the Site. We sometimes use cookies delivered by third parties to track the performance of our advertisements. For example, these cookies remember which browsers have visited the Site. By way of example, as you browse the Site, advertising cookies may be placed on your computer so that we can understand what you are interested in. Our advertising partners then enable us to present you with retargeted advertising on other sites based on your previous interaction with the Site. Third parties, with whom we partner to provide certain features on the Site or to display advertising based upon your web browsing activity, use Flash cookies to collect and store information. Flash cookies are different from browser cookies because of the amount of, type of, and how data is stored.	To learn more about these and other advertising networks and their opt out instructions, click here . To learn how to manage privacy and storage settings for Flash cookies, click here .

We and our service providers may also use “pixel tags,” “web beacons,” “clear GIFs,” or similar means in connection with the Services and HTML-formatted email messages to, among other things, track the actions of users, to determine the success of marketing campaigns and to compile aggregate statistics about Site usage and response rates.

3. Use of Collected Information

We use the information you provide to us, or that we collect about you from other sources, for the following purposes: (i) verify your identity; (ii) comply with and support our bank partners’ compliance with applicable law, including anti-money laundering (“**AML**”) and sanctions screening rules; (iii) prevent, detect, and investigate fraud, hacking, infringement, or other suspected or actual misconduct, crime, or violation of an agreement involving the Services; (iv) to further our legitimate interests in providing the Services, including without limitation to collect and remit payment for paid features; (v) to administer your use of the Services and any Accounts you may have with us; (vi) to personalize your experience; (vii) to provide to you Service announcements or inform you of new releases and features; (viii) to provide you with further information and offers from us or third parties that we believe you may find useful or interesting, such as newsletters, marketing or promotional materials; (ix) to perform tasks on behalf of and according to instructions of a third party, such as payment processors, third party-service providers, (x) to enforce our Terms of Service; (xi) to resolve any disputes between users of the Site or between such users and us; (xii) comply with a legal requirement or process, including, but not limited to, civil and criminal subpoenas, court orders or other compulsory disclosures; (xiii) to further our legitimate interest

in protecting our rights, property, or safety and the rights, property and safety of the Services, our users or the public; (xiv) to contact you to obtain feedback from you regarding the Site and the Services; and (xv) open a Pay Tgthr Debit Mastercard through our banking partners.

In addition to the purposes described above, we use the information collected automatically to (i) to further our legitimate interests in monitoring and analyzing the use of the Services and for the technical administration of the Site; (ii) improve the Site and the Services; (iii) generate and derive useful data and information concerning the interests, characteristics and website use behavior of our users; and (iv) verify that users of the Services meet the criteria required to process their requests. We and or our advertising partners may use demographic and geo-location, as well as information logged from your hardware or device, including data such as IP address, device model and ID, MAC address, operating system, application usage data, device time zone, region and language, and click ID, to ensure relevant advertising is presented within the Services.

4. Third Parties We Share Personal Information With

We may disclose Personal Information you provide to us or that we collect automatically on the Site and in and through the Services with the following categories of third parties:

- Service providers, such as payment processors, web hosting and data storage service providers, and helping us deliver and develop the Services. data storage service providers, marketing service providers, and communications service providers;
- We use Plaid Technologies, Inc. (“**Plaid**”) to gather user data from financial institutions. By using our Service, you grant Pay Tgthr and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information being transferred, stored, and processed by Plaid in accordance with the [Plaid Privacy Policy](#);
- Our advertising partners in compliance with applicable law;
- Public authorities, such as law enforcement, if we are legally required to do so or if we need to protect our rights or the rights of third parties; and
- Our subsidiaries and affiliates; or a subsequent owner, co-owner or operator of the Site and/or the Services and their advisors in connection with a corporate merger, consolidation, restructuring, the sale of substantially all of our stock and/or assets, or in connection with bankruptcy proceedings, or other corporate reorganization, in accordance with this Privacy Policy.

5. Links to Other Websites

We frequently make content or services from other websites available to you from links located on the Site. We may present links in a format that enables us to keep track of whether these links have been followed. This Privacy Policy applies only to the Site and the Services. We do not exercise control over third-party services or other websites that provide information, or over banners, other advertisements or links from within the Site or the Services. Your interactions with these third-party services are governed by the privacy policy of the company providing it. These other sites and services may place their own cookies or other files on your computer’s browser, collect data or solicit Personal Information from you. Other websites and services follow different rules regarding the use or disclosure of the Personal Information that you submit, and the collection and use of such information and access of any third-party

websites are subject to such third party's privacy policy. We encourage you to read the privacy policies and other terms of such third parties before using their services.

6. Security

We understand the importance of privacy and security of Personal Information to our users and have made them a priority. Pay Tgthr uses a variety of industry-standard security technologies and procedures to help protect Personal Information about you from unauthorized access, use, or disclosure and trains Pay Tgthr employees on privacy and security issues. However, we cannot guarantee that unauthorized third-parties will never be able to overcome those measures or use your Personal Information for improper purposes, and we do not promise that Personal Information about you or private communications will be protected from unauthorized disclosure or use.

7. Do Not Track Signals and Similar Mechanisms

Pay Tgthr does not track its customers over time and across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals.

8. Children Under the Age of 13

Our Site and Services are not directed to or intended for access or use by, and we do not knowingly collect personal information from, children under 13 years of age. If you are under 13 years of age, do not access, use or provide any information on our Site or provide and information about yourself to us, including your name, address, telephone number, e-mail address or any screen name or username you may use. If we learn we have collected or received Personal Information from a child under 13 years of age, we will delete that information. If you believe we might have any information about a child under 13 years of age, please contact us at hi@paytgthr.com and we will make reasonable efforts to delete such information from our records.

9. Managing Your Privacy

We keep your data on your behalf and for your benefit. You can correct or terminate and delete your Account information by following the instructions on the Services or by e-mail at hi@paytgthr.com, which you may also access for further assistance and questions regarding the Privacy Policy or for a copy of your Account data; provided, however, that we may retain copies of your Account information for the purposes of fraud detection and prevention, AML obligations, to comply with our obligations to third-party service providers, and as otherwise required by law. If you cancel your Account or request us to delete your information, Pay Tgthr will limit its access to Personal Information to perform what is requested by you and will delete information accessible to Pay Tgthr within ten (10) business days.

10. California Residents

California Civil Code Section 1798.83 requires certain businesses that share customer Personal Information with third parties for the third parties' direct marketing purposes to respond to requests from California customers asking about the businesses' practices related to such information-sharing. We currently do not share or disclose your Personal Information to third parties for the third parties' direct marketing purposes. If we change our practices in the future, we will implement an opt-out policy as required under California laws.

Furthermore, subject to certain exemptions, California residents have the following rights with respect to Personal Information we may have collected about them:

Requests to Know

You have the right to request that we disclose:

- The categories of Personal Information we have collected about you;
- The categories of Personal Information about you we have sold or disclosed for a business purpose;
- The categories of sources from which we have collected Personal Information about you;
- The business or commercial purposes for selling or collecting Personal Information about you;
- The categories of Personal Information sold or shared, if any, about you, as well as the categories of third parties to whom the Personal Information was sold, by category of Personal Information for each party to whom Personal Information was sold; and
- The specific pieces of Personal Information collected.

You may submit a request to know via hi@paytgthr.com. The delivery of our response may take place electronically or by mail. We are not required to respond to requests to know more than twice in a 12-month period.

We do not sell, and have not in the prior 12 months sold, Personal Information about California residents. Therefore, we have not included a “Do Not Sell My Personal Info” link on our Site. If our practices change, we will update this Privacy Policy and take any other necessary action to comply with applicable law. We do, however, disclose Personal Information for business purposes as described in the “Third Parties We Share Personal Information With” section above.

Requests to Delete

You have the right to request that we delete any Personal Information about you that we have collected; provided, however, that we may retain copies of your Account information for the purposes of fraud detection and prevention, AML obligations, to comply with our obligations to third-party service providers, and as otherwise required by law. Upon receiving a verified request to delete Personal Information, we will do so unless otherwise required or authorized by law. You may submit a request to delete Personal Information via hi@paytgthr.com.

Authorized Agents

You may designate an authorized agent to make requests on your behalf. You must provide an authorized agent written permission to submit a request on your behalf, and we may require that you verify your identity directly with us. Alternatively, an authorized agent that has been provided power of attorney pursuant to Probate Code sections 4000-4465 may submit a request on your behalf.

Methods for Submitting Consumer Requests and Our Response to Requests

You may submit a request for access and requests to delete Personal Information about you via:

- <https://www.paytgthr.com/PersonalInformationRequest>, or
- via email at hi@paytgthr.com.

Upon receipt of a request, we may ask you for additional information to verify your identity. Any additional information you provide will be used only to verify your identity and not for any other purpose.

We will acknowledge the receipt of your request within 10 days of receipt. Subject to our ability to verify your identity, we will respond to your request within 45 days of receipt. If we require more time (up to 90 days), we will inform you of the reason and extension period in writing. In order to protect your privacy and the security of Personal Information about you, we verify your request by authenticating your Account or asking for submission of identifying information, such as a drivers' license or other photo identification.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

The Right to Non-Discrimination

You have the right not to be discriminated against for the exercise of your California privacy rights described above. Unless permitted by the CCPA, we will not:

- Deny you goods or services;
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties;
- Provide you a different level or quality of goods or services; or
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

11. International Transfers of Personal Information

Pay Tgthr is based in the United States. As a result, Personal Information that we collect in and through the Services and on the Site may be transferred to our U.S. offices. In addition, we may work with third-party service providers in the U.S. and in other countries to support our business activities. Thus, Personal Information may be transferred to, stored on servers in, and accessed from the United States and countries other than the country in which the Personal Information was initially collected. In all such instances, we use, transfer, and disclose Personal Information solely for the purposes described in this Privacy Notice and in compliance with applicable laws.

12. Data Retention

We keep Personal Information related to your Account for as long as it is needed to fulfill the purposes for which it was collected, to provide our services, to deal with possible legal claims, to comply with our business interests and/or to abide by all applicable laws. Thereafter, we either delete Personal Information about you or de-identify it. Please note that even if you request the deletion of Personal Information about you, we may be required (by law or otherwise) to retain the Personal Information and not delete it. However, once those requirements are removed, we will delete Personal Information about you in accordance with your request.

13. Changes to the Privacy Policy

Our security and Privacy Policy are periodically reviewed and enhanced as necessary. This Privacy Policy might change as we update and expand the Services. You can tell when this Privacy Policy was last updated by reviewing the Last Updated-legend on top of this page. We will endeavor to notify you of these changes by email, but will not be liable for any failure to do so. We also encourage you to review this Privacy Policy periodically. If you do not understand any of the terms or conditions of any of our policies, you may inquire regarding the same via email at hi@paytgthr.com. Your continued use of the Services after any change in this Privacy Policy will constitute your acceptance of such change.

14. Contacting Us

If you have any concerns or questions about this Privacy Policy, please contact us at hi@paytgthr.com.