

## Privacy Policy

This Privacy Policy (the “**Privacy Policy**”) is an integral part of the PayKii (“**We**,” “**our(s)**,” “**us**”) Online Terms & Conditions (the “**Terms**”) and describes how we use and disclose certain information related your use of our website <http://www.paykii.com> (the “**Site**”) and the services we may provide to you (the “**Services**”). Our Site may contain links, or refer to other sites at which Personal Information (as defined below) may be collected. In such instances, unless expressly provided to the contrary, the collection and use of your Personal Information will be governed by the privacy policies applicable to those sites. Those privacy policies should identify the entity(ies) collecting your Personal Information.

Capitalized terms used in this Privacy Policy have the meanings stated in the Terms unless otherwise defined herein. If you have objections to this Privacy Policy, you should not access or use the Site or Services.

### 1. Collection and Use of Information

“*Personal Information*” is defined as any information that identifies or can be used to identify, contact, or locate the person to whom such information pertains. Any Personal Information that we collect and maintain will be subject to the version of the Privacy Policy in effect at the time of such collection.

#### A) Types of Information Collected

In our provision of Services, we may collect the following information:

- a) your first and last name;
- b) contact information, and/or credit card or other financial account information;
- c) your browser type and operating system;
- d) your IP address;
- e) the length of time you visit our Site or use our Services; and
- f) the referring URL, or the webpage that led you to our Site.

Please note that the above list is not meant to be an exhaustive list of information we collect.

We may collect this information individually and, therefore, identify you personally, or we may collect it in aggregate form, without identifying any user individually. You acknowledge we own any aggregate, non-identifying, statistical data we collect and may use it for any lawful purposes, including statistical analysis, marketing, or similar promotional purposes.

Provision of the Personal Information and any other information listed above is not required. However, where this information is necessary for us to provide the Services and you chose not to provide it, you acknowledge we may be unable to provide you the Services.

#### B) Purpose of Collection of Information

We collect your information in order to record and support your participation in the Services or activities you selected and to better understand your needs. Your engagement in ordering Services may require you to provide Personal Information to us.

Moreover, we may collect environmental variables like number of clicks, length of time spent on the Site, etc. to facilitate and track your use of the Site or Services as well as to measure traffic patterns on our Site and usage patterns of our Services. We may disclose the information we collect as more specifically set forth in this Privacy Policy.

## **2. Transfer and Storage of Personal Information**

When you submit Personal Information through the Services, you understand and agree that this information may be transferred across national boundaries to carry out the Services and may be stored and processed in any of the countries where we, and our affiliates and subsidiary entities, operate through our local partners and vendors.

## **3. Disclosure to Third Parties**

### **A) Authorized Vendors**

We have established relationships with service providers, who are trusted vendors or authorized third parties, and whose services are available to you through our Services (“**Authorized Vendors**”). You acknowledge that with respect to the Services, the collection, transfer, storage, and processing of your information may be undertaken by these Authorized Vendors. Unless expressly provided to the contrary, Personal Information that you provide while using our Services in conjunction with an Authorized Vendor’s service will be subject to this Privacy Policy.

In addition, Authorized Vendors are bound by contract not to use your Personal Information for their own purposes or provide it to any other third parties and are bound by the same or similar terms and conditions as set forth in this Privacy Policy. We shall disclose only that information we believe in our reasonable discretion is necessary to carry out the Services and the purposes of the corresponding agreement with such third party.

### **B) Government or Public Authorities**

Notwithstanding any protections to Personal Information herein, we may disclose Personal Information if disclosure is required by a valid and lawful order of a court or other governmental or public body having jurisdiction or to meet national security or law enforcement requirements. We will endeavor to use commercially reasonable efforts to disclose only that which is required to comply with the request.

### **C) Business Transfers**

If we are acquired by or merged with another company, if some or all of our assets are transferred to another company, or as part of a bankruptcy proceeding, we may transfer all the information we have collected from you to the other company.

### **D) Protect Us and Others**

We also may disclose the information we collect from you where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person, violations of our Terms or this Privacy Policy, or as evidence in litigation or administrative proceedings in which we are involved.

#### **4. Your Choice with Respect to Personal Information**

We recognize and appreciate the importance of responsible use of information collected on our Site and/or through our Services. You may indicate to us that you do not want your Personal Information to be used by anybody for direct marketing purposes or for such other similar purpose. In the event that you indicate that you do not want your Personal Information to be used for direct marketing purposes, then we will not use it without your consent, we will not communicate any information to you regarding products, services, and special offers available, although we may find it necessary to communicate with you regarding your use of our Site and/or Services. Except in the particular circumstances described in this Privacy Policy, we will not provide your name to other companies or organizations without your consent.

If you have previously agreed to us using your Personal Information for direct marketing purposes, you may change your mind at any time by writing to us and we will remove you from any such marketing or advertising lists.

#### **5. Information Security**

We are committed to ensuring that your Personal Information is secure. In order to prevent misuse, unauthorized access or disclosure, alteration and/or destruction, we have put in place suitable physical, logical and managerial procedures to safeguard and secure the information we collect. Systems and processes have been scrutinized for limiting access to only required personnel, and the proper protections and restrictions to physical accessibility have been implemented to secure your Personal Information from accidental loss and from unauthorized access, use, alteration or disclosure.

#### **6. Use of Cookies**

When you visit our Site, you can browse and access important information without revealing your identity. In order to improve our Site and Services, we may use “cookies” to track your usage. A cookie is a small amount of data that is transferred to your browser by a Web server and can only be read by the server that gave it to you. It functions as your identification card, and enables us to record your passwords, purchases, and preferences. It cannot be executed as code or deliver viruses. Most browsers are initially set to accept cookies. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether to accept it. (For some Web pages that require an authorization, cookies are not optional. Users choosing not to accept cookies will probably not be able to access those pages.) While we use cookies to track your usage of our Site and Services, and our Web servers automatically log the IP/Internet address of your computer, we do not generally use this information to identify you personally. However, if you expressly provide consent for our Site to “remember” the unique identifier that you select when you register for various activities on the site, that unique identifier will be stored on a cookie on your computer, linked to your registration information, and your navigation path around the site will be tracked. We associate this data to understand how our site and services are being used so we can understand our customers and offer appropriate products and services.

#### **7. Updating Your Personal Information and Privacy Preferences**

We will retain your registration information for as long as your account is active or as needed to provide you Services, however you have the right to access, correct or delete Personal

Information about you that is stored by us and to set your privacy preferences at any time. You may access, correct, or delete your Personal Information and privacy preferences (such as whether you wish to receive promotional communications from us or third parties) by writing or calling us at:

**Paykii**

Attn: Privacy Officer

Address: 1655 N Fort Meyer Dr, Suite 700, Arlington VA 22209

In the event that you cannot access and correct this information on your own, in your correspondence, please indicate with as much detail as possible the location within the relevant Site or Services where you provided your Personal Information, so that we may correct it.

**8. Privacy-Related Inquiries and Complaints**

We take our users' privacy concerns seriously. If you believe that we have not complied with this Online Privacy Policy with respect to your Personal Information or you have other related inquiries or concerns, you may write directly to the Privacy Officer at the address indicated above.

In your letter, please describe in as much detail as possible the nature of your inquiry or the ways in which you believe that we have not complied with this Privacy Policy. We will investigate your inquiry or complaint promptly.

Please note that if you provide us with inconsistent privacy preferences (for example, by indicating on one occasion that third parties may contact you with marketing offers and indicating on another occasion that they may not), we may not guarantee that your most recent privacy preference will be honored.

Also, please note that we are not responsible for the content or privacy practices of other Web sites to which our Site or any of Services may link or reference. You should review the privacy policy of such sites before using the sites.

**9. Changes in Privacy Policy**

We reserve the right to change the Privacy Policy from time to time at our sole discretion, and will provide notice of material changes on the home page of our Site. You will be deemed to have been made aware of, and will be subject to, the changes to the Privacy Policy by your continued use of the relevant Site or Services. If the changes we make include a material change in the information we collect or the purposes of such collection, you shall be given an opportunity to opt-out of such collection.

**Effective Date:**

October 4, 2017