

RECEIVE

PRIVACY AND DATA PROTECTION POLICY AND NOTICE

Last modified: February 24, 2023

1. INTRODUCTION

- 1.1 Receive and/or any of our affiliates and subsidiaries (collectively, “we,” “us,” or “our” and similar forms) respect the privacy of our users, employees and website visitors, and are committed to protecting the personal information you may share with us. We also protect our followers, vendors, service providers, partners and others who come in contact with us (these and any others with respect to whom we collect personal data, shall collectively be referred to as “Users” or “you” or “Data Subjects”).
- 1.2 This Privacy Policy explains the types of information we may collect from you or that you may provide when you access or interact with our online platform available at <https://www.receivefinance.com/> (“Platform”) or use any of physical or virtual payment card managed through the Receive account (the “Product”); use our mobile application or visit our website, <https://www.nowreceive.com/> (“Website”) or our social media pages; or you may provide us with such data in the course of business transactions, sales and support (collectively, the “Services”). Our processing of information through the Product is governed by the terms of our agreements with the issuing bank and the applicable business customer, together with our terms of service.
- 1.3 Your use of our Platform, Product or other Services constitutes your agreement to this Privacy Policy and our data practices, and any other policies made available by us to you. If you do not agree, please notify us in writing, close your Account, and cease all use of the Platform, Product or other Services.
- 1.4 We are transparent about our practices regarding the information we may collect, use, maintain and process and describe our practices in this policy and notice. Please note that our Website may, from time to time, contain links to external sites. We are not responsible for the operation, privacy policies and practices or the content of such sites. Please read the following carefully to understand our practices regarding your personal data and how we will treat it.
- 1.5 Personal Data means information that relates to an identified or identifiable individual (“Personal Data“). This can be data which when gathered, consists of any details which are personally identifiable.

2. CATEGORIES OF INFORMATION WE MAY COLLECT & PROCESS

- 2.1 Our Product is designed for use by business customers and their employees and authorized users. Our processing of information collected through the Product or otherwise provided to us by a business customer in connection with their use of the Product is governed by the terms of our agreements with the issuing bank and the applicable business customer, including our terms of service. In the event of a conflict between this Privacy Policy and the terms of any agreements between a business customer and us, the terms of those agreements will govern and control. In the event we are permitted to process the information for our own purposes, we will process the information in accordance with the practices described in this Privacy Policy. We are not

responsible for how our business customers treat information we collect on their behalf, and we recommend you review their own privacy policies

- 2.2 You do not have any legal obligation to provide any information to us, however, we require certain information in order to provide you the Services, including in order to use our Platform. If you choose not to provide us with certain information, then we may not be able to provide you with some or all of the Services, including our Product or using our Platform.
- 2.3 We collect data about you when you sign up to our Platform for using the Product, visit our Website, or use our Services.
- 2.4 We also collect personal data when you make a purchase on your card, pay a bill, request or receive a reimbursement or use our other payments functionality; Merchant Category Code (MCC), audit logs, View your purchases or make changes to your account; Change administrative or other settings within your account; Use integrations to connect your account to third party services.
- 2.5 The categories of information and data we may collect from, on behalf of, or in connection with our Users:

i. Data we collect about you when you interact with us and our Services:	
a. Personal Data provided consciously and voluntarily by you through your use of the Services or Website:	<p>Contact Data</p> <p>This may include name (first and last), email address, phone numbers, postal address, physical address, your company data including its name and your job title, financial data, or other identifier by which you may be contacted online or offline.</p> <p>You may choose to voluntarily provide other information to us that we do not request, and, in such instances, you are solely responsible for such information.</p>
b. Personal Data we automatically collect through our Service	<p>Location data</p> <p>Related to the geographic location of your laptop, mobile device or other digital device on which the Platform or Website is used (including imprecise location information such as location derived from an IP address or information that indicates a city or postal code level).</p>
	<p>Service use data</p> <p>Including information about how much time you spend on particular pages you visit on our Website or Platform, the features you use, your preferences or selections, the time of day you browse, and your referring and exiting pages.</p>
	<p>Device data</p> <p>Including information about the type of device or browser you use, your device's operating software, your internet service provider,</p>

	your device's regional and language settings, and device identifiers such as IP address and Ad ID.
c. Tracking technologies we use to automatically collect information include	<p>Log Files, which are files that record events that occur in connection with your use of the Service</p> <p>Cookies, which are small data files stored on your device that act as a unique tag to identify your browser. We use two types of cookies: session cookies and persistent cookies. Session cookies make it easier for you to navigate websites and expire when you close your browser. Persistent cookies help with personalizing your experience, remembering your preferences, and supporting security features. Additionally, persistent cookies allow us to bring you advertising. Persistent cookies may remain on your device for extended periods of time, and generally may be controlled through your browser settings.</p> <p>Pixels (also known as web beacons), which is code embedded in a website, email, or advertisement that sends information about your use to a server. There are various types of pixels, including image pixels (which are small graphic images) and JavaScript pixels (which contains JavaScript code). When you access a website, email, or advertisement that contains a pixel, the pixel may permit us or a separate entity to drop or read cookies on your browser. Pixels are used in combination with cookies to track activity by a particular browser on a particular device. We may incorporate pixels from separate entities that allow us to track our conversions, bring you advertising, and provide you with additional functionality</p> <p>Device Fingerprinting, which is the process of analyzing and combining sets of data elements from your device's browser, such as JavaScript objects and installed fonts, to create a "fingerprint" of your device and uniquely identify your browser and device</p>

ii. Data we collect through our Product:	
Personal Data provided consciously and voluntarily by you through your use of the Platform or the Product:	<p>Contact Data</p> <p>This may include name (first and last), email address, phone numbers, physical address, postal address, your company data including its name, address and your job title, financial data, or other identifier by which you may be contacted online or offline.</p> <p>You may choose to voluntarily provide other information to us that we do not request, and, in such instances, you are solely responsible for such information.</p>
	Financial Data , including your or your company's bank balance, routing and account numbers, transaction history, tax identification number and related information.
	Billing Data , including information to process your payments to us, such as your payment card number, expiration date, and security code.
	Account Credentials , including your password and information for authentication and account access.
	Transaction Data , including information associated with your payments and use of your Cards, whether online or in store, such as your Card number, Merchant Category Code (MCC), audit logs, transactions, purchase details, amounts, and locations.
	Authorized User Data , including information you provide about any users who will be issued a Card, such as their name, email address, and phone number. Where you provide information about other users, you agree that you have all rights and permissions necessary to provide such information to us.
	Content , including content within any messages you send to us (such as when contacting support or asking a question). We also collect content within any messages you exchange with other users through the Product, such as when you use the software integration to submit a request to the account administrator to make a transaction or to increase a spending limit on a Card.
Personal Data we automatically collect through our Service	Location data, Service use data and Device data – as described in the above table regarding the Services.

We may prohibit your use of the Product if you do not provide information when required, where it is inaccurate, out-of-date, or unable to be validated.

iii. Data we collect and process from other sources:
Financial Partners, Card Network Partners, Merchants, Payment Processors and Card Issuing Partners in connection with your use of the Product.
Identity Verification Services and Financial Information Providers.
Third Party Integrations , such as with your designated bank, account services, transactional information providers, and other integrations that you connect to your account.
Social Networks and other locations that serve or assist in serving our advertisements.
Joint Marketing, Referrals, and Rewards Partners that we engage for joint marketing activities and also our referrals and rewards program.
Publicly-available sources , including information in the public domain

We treat the information collected from other sources subject to any laws or contractual obligations applicable to us. In the event we are permitted to process the information for our own purposes, we will process the information in accordance with the practices described in this Privacy Policy.

2.6 For purposes of the California Consumer Privacy Act of 2018 ("CCPA"), the table above reflects the data collected in the past 12 months. We do not sell information collected through the Service or Product.

3. THE PURPOSES FOR PERSONAL DATA WE COLLECT & PROCESS:

- i. **To provide you our Services and to allow you to use our Platform or Product.** We use the Personal Data we collect to operate and manage our Service and Product, including to provide the Website, determine eligibility for the Product, allow you to use the Card and access the Platform, and otherwise provide services requested by you and our business customers.

We also use the Personal Data to check if you meet all of our requirements and are eligible to use our Platform, Services or Product; provide you with the information and Services that you request from us including but not limited to using the Platform;

- ii. **Administering your account** with our Platform including to identify and authenticate you and notifying you about changes to our Service;
- iii. **Verifying and carrying out financial transactions** in relation to your uses of our Services;
- iv. **Contacting you** for the purpose of providing you with technical assistance and other related information;
- v. **Security and Fraud Detection.** We use the information we collect to prevent and detect potentially fraudulent or unauthorized transactions, breach of policies or terms, and threats of harm; for security purposes and to identify and authenticate your access to the parts of the facilities;

- vi. **Marketing and Advertising.** Contacting you to give you commercial and marketing information about events or promotions or additional Services or products offered by us, including in other locations; soliciting feedback in connection with your use of the Services; tracking use of our facilities and Services to enable us to optimize them;
- vii. **To meet our contractual, ethical, and legal obligations.** Regarding our Services, including our Platform or Product and our obligations to our Partners. For example: to carry out and enforce our rights arising from any contracts entered into between you and us, including for billing and collection; replying to your queries, troubleshooting problems, detecting and protecting against error, fraud or other criminal activity; compliance and audit purposes, such as meeting our reporting obligations in our various jurisdictions, and for crime prevention and prosecution in so far as it relates to our staff, Users, facilities etc.;
- viii. **Comply with applicable laws.** Comply with applicable laws, lawful requests, and legal processes, such as to respond to subpoenas or requests from government authorities and legal processes, such as to respond to subpoenas or requests from government authorities if necessary. To enforce our terms, policies and legal agreements, to comply with court orders and warrants and assist law enforcement agencies as required by law, to collect debts, to prevent fraud, infringements, identity thefts and any other service misuse, and to take any action in any legal dispute and proceeding; audit our internal processes for compliance with legal and contractual requirements and internal policies; and
- ix. **Understanding Usage and Improving our Services and Products.** We use the information we collect to understand how our business customers use the Service and Product, and improve our services and products. For example, we may use information to provide you with recommendations on how to lower your spending and inefficiency. We may also improve usability of the Service and Product by analyzing how you interact with our Service and Product (such as analyzing how you use tools made available to you or on which links you click).

4. SHARING DATA WITH THIRD PARTIES

We transfer personal data within our group, and to third party service providers.

We transfer Personal Data to the following:

i. Identity Verification Services	We share information as necessary to verify your identity.
ii. Card-issuing and Payments Partners	We share information with banks in connection with providing Card and payment services to you.
iii. Credit Reporting Agencies and Other Financial Information Providers	From time to time, we may share information about you and your account with credit reporting agencies to verify information about your business, to report on your business's performance, and to report late payments, missed payments, or other defaults. From time to time we may be legally required to transfer your personal data to governmental authorities.
iv. Security and Compelled Disclosure	We share information to comply with the law, regulations, payment network rules, or other legal processes, and where required in response to lawful requests by public authorities, including to meet national security or law enforcement

	<p>requirements. We also share information with regulators, law enforcement, financial services providers, and other authorized third parties as required by law. We will also share information to protect the rights, property, life, health, security and safety of us, the Service, the Product, or anyone else.</p>
<p>v. Service Providers</p>	<p>We share information with service providers that process information on our behalf. Service providers assist us with services such as payment processing, Card services, data analytics, website hosting, and technical support. We contractually prohibit our service providers from retaining, using, or disclosing information about you for any purpose other than performing the services for us, although we may permit them to use information that does not identify you (including information that has been aggregated or de-identified) for any purpose except as prohibited by applicable law or contractual obligation.</p>
<p>vi. Affiliates</p>	<p>We share information with our affiliates and related entities, including where they act as our service providers or for their own internal purposes.</p>
<p>vii. Business Customers</p>	<p>We share information with our business customers to provide services on their behalf. For example, we share information with our business customers to facilitate your account purchases, maintain and administer your Cards, respond to your and their questions, comply with your and their requests, and otherwise comply with the law. In addition, business customer administrators and managers will see certain information you submit through your account, such as receipts uploaded, or requests submitted. Our business customers are independent entities and their processing of information is subject to their own privacy policies.</p>
<p>viii. Referrals and Joint Marketing</p>	<p>We share information with our partners in connection with facilitating referral partnerships or engaging in joint marketing activities. For example, if you were referred to our Service or Product through a referral partner, we share information with our referral partner to calculate the referral fee.</p>
<p>ix. Marketing and Advertising</p>	<p>We share information collected through the Service with vendors or other parties for marketing and advertising related purposes. These parties may act as our service providers, or in certain contexts, independently decide how to process your information. For more information, see the "Analytics and Advertising" section below.</p>
<p>x. Mergers and Acquisition</p>	<p>We share information in connection with, or during negotiations of, any proposed or actual merger, purchase, sale or any other type of acquisition or business combination of all</p>

	or any portion of our assets, or transfer of all or a portion of our business to another business.
xi. At your Request or consent	We share information at your request or direction, such as if you direct us to connect your account to a third- party integration. We may otherwise share information after providing notice to you and obtaining your consent.

5. ANALYTICS AND ADVERTISING

- 5.1 We use analytics services, such as Google Analytics, to help us understand how users access and use the Service. In addition, we work with agencies, advertisers, ad networks, and other technology services to place advertisements on our behalf on other websites and services. For example, we may place ads through Google and Facebook that you may view on their platforms as well as on other websites and services.
- 5.2 As part of this process, we may incorporate tracking technologies into our own Service (including our Website and emails) as well as into our ads displayed on other websites and services. Some of these tracking technologies may track your activities across time and services for purposes of associating the different devices you use, and delivering relevant ads and/or other content to you ("Interest-based Advertising").
- 5.3 As indicated above, vendors and other parties may act as our service providers, or in certain contexts, independently decide how to process your information. We encourage you to familiarize yourself with and consult their privacy policies and terms of use.
- 5.4 While you may disable some tracking technologies by blocking cookies in your browser, you may still see advertising as part of a broader marketing campaign. For further information on the types of tracking technologies we use on the Service and your rights and choices regarding analytics and Interest-based Advertising, please see the "Information Collected through the Service" and "Your Rights and Choices" sections.

6. PRIVACY CHOICES

- 6.1 **Access to account information.** You may update, correct, or delete your account information by accessing the account you have established with us on the Services.
- 6.2 **Opt out of marketing communications.** You may opt out of marketing-related emails by following the opt-out or unsubscribe instructions at the bottom of the email. You may continue to receive service-related and other non-marketing emails.
- 6.3 **Online tracking opt-out.** Blocking cookies in your browser as further detailed in www.allaboutcookies.com or Blocking advertising ID use in your mobile settings; Using privacy plug-ins or browsers or change the settings of Google Analytics. You can also opt out features that let you opt out of use of your information for interest-based advertising such as [Facebook](#) or [Google](#).
- 6.4 **Do Not Track.** Some Internet browsers may be configured to send "Do Not Track" signals to the online services that you visit. We currently do not respond to "Do Not Track" or similar signals.

7. DATA SUBJECT RIGHTS

- 7.1 **Data subjects have rights, and we respect them.** Data subjects have rights under applicable data protection laws, such as the CCPA, the EU 679/2016 General Data Protection Regulation ("GDPR") or other local laws, including, in different circumstances, rights to data portability, rights to access data, rectify data, object to processing, erase data and the right to lodge a complaint. Under the CCPA you also have the right not to receive discriminatory treatment by us for the exercise of any of your rights.
- 7.2 **To exercise any of these rights, please submit a request by sending an email pursuant to the contact details set forth below,** and specify which right you are seeking to exercise and the scope of the request. We will confirm receipt of your request within 10 days. We may require specific information from you to help us verify your identity and process your request. If we are unable to verify your identity, we may deny your requests to know or delete.
- 7.3 **Data subject rights cannot be exercised in a manner inconsistent with our rights, our proprietary rights, and third-party rights.** Generally, data subjects have a right to withdraw their consent. Additionally, if a data subject wishes to modify, delete or retrieve their Personal Data, they may do so, where applicable, by contacting us as specified below.
- 7.4 **Please note that Personal Data may be either deleted or retained in an aggregated manner without being linked to any identifiers or Personal Data,** depending on technical commercial capability. Such information will continue to be used by us. In certain circumstances, such as other contractual or legal obligations, we will need to confirm your choice before we can fully process your request.

8. LAWFUL BASIS FOR PROCESSING

- 8.1 **Controller-Processor.** We act as a controller with respect to Personal Data collected as you interact with our Service. For the Product, we act as a controller, and in certain instances may act as a processor on behalf of a business customer, which is the controller.
- 8.2 **Our lawful bases for processing of the Personal Data include** the following: (a) you have given consent to the processing for one or more specific purposes, either to us or to our service providers, partners, or business customers; (b) processing is necessary for the performance of a contract with you; (c) processing is necessary for compliance with a legal obligation; or (d) processing is necessary for the purposes of the legitimate interests pursued by us or a third party, and your interests and fundamental rights and freedoms do not override those interests.
- 8.3 **GLB notice.** We may collect and/or receive your non-public personal information ("NPI") as set forth herein and, therefore, we adhere to the requirements of the Gramm-Leach Bliley Act, 15 U.S.C. 6810 – 6827 (also known as the Financial Services Modernization Act of 1999) ("GLB"). NPI does not include any publicly available information. Additionally, some of your NPI may be disclosed, transferred, processed, stored or used overseas by us or by third party service providers.

9. INTERNATIONAL DATA TRANSFERS

- 9.1 We currently store your Personal Data in one of our servers located in the US.
- 9.2 We may transfer your Personal Data to the United States and other countries which may not have the same data protection laws as the country in which you initially provided the information, but

we will protect your Personal Data in accordance with this Privacy Policy, or as otherwise disclosed to you.

- 9.3 We comply with applicable legal requirements when transferring Personal Data to countries other than the country where you are located. If you are located in the EEA, we will transfer your Personal Data in accordance with adequacy decisions (see list of countries for which the European Commission has issued an adequacy decision [here](#)), standard contractual clauses, and other data transfer mechanisms.

10. DATA RETENTION

- 10.1 **We retain Personal Data** for the following reasons and for as long as required under applicable laws, to provide the Services, including our Platform or Product; to comply with our legal and other obligations; to resolve disputes and to enforce agreements; to meet any audit, compliance and business best-practices.
- 10.2 **Data that is no longer retained may be anonymized or deleted.** Data may be deleted or anonymized after a while, except where such data must be retained by us, in our judgment, as above. Likewise, some unidentified metadata and statistical information concerning the use of our Platform, Product or Services are not subject to the deletion procedures and may be retained by us. Some data may also be retained on our third-party service providers' servers until deleted in accordance with their privacy policy and their retention policy.

11. SECURITY AND STORAGE OF INFORMATION

- 11.1 We use administrative technical and physical security measures to protect your Personal Data. These measures include computer safeguards and secured files and facilities. We take reasonable steps to securely destroy or permanently de-identify Personal Data when we no longer need it. We will keep your Personal Data only as long as we must deliver our products and services, unless we are required by law or regulation or for litigation and regulatory investigations to keep it.
- 11.2 We implement, enforce and maintain security measures, technologies and policies to prevent unauthorized or accidental access to or destruction, loss, modification, use or disclosure of personal data. We likewise take steps to monitor compliance on an ongoing basis. Where we deem it necessary in light of the nature of the data in question and the risks to data subjects, we may encrypt data. Likewise, we take industry standard steps to ensure our Platform, Website and Services are safe.
- 11.3 Note, however, that no data security measures are perfect or impenetrable, and we cannot guarantee that unauthorized access, leaks, viruses and other data security breaches will never occur.

12. MINORS

We do not knowingly collect or solicit information or data from children under the age of 16 or knowingly allow children under the age of 16 to register for our Platform, Product or Services. If you are under 16, do not register or attempt to register for any of our Service or send any information about yourself to us. If we learn that we have collected or have been sent Personal Data from a child under the age of 16, we will delete that Personal Data as soon as reasonably practicable without any liability to us.

If you believe that we might have collected or been sent information from a minor under the age of 16, please contact us as soon as possible.

13. CHANGES TO THIS PRIVACY POLICY

We may amend or update this Privacy Policy from time to time. The most current version of this Privacy Policy will be available on our official Website. Changes to this Privacy Policy are effective as of the stated "Last Revised Date" and your continued use of our Website, Platform and Services will constitute your active acceptance of the changes.

14. CONTACT US

If you have any questions or comments concerning this Privacy Policy, you are welcome to contact us at info@receivcorp.com and we will do our best to reply within a reasonable timeframe.

By mail:

Receive Corp
502 Salem Street, Paramus
New Jersey, NJ 07652

* * *