PRIVACY POLICY

OGPAY WALLET CUSTOMER PRIVACY POLICY

The OGPAY Wallet Customer Privacy Policy covers the collection, use, and disclosure of personal information that may be collected by OGPAY Wallet anytime you interact with OGPAY Wallet or through the OGPAY Wallet data application, such as when you use our Customer Management System (CMS), when you purchase OGPAY Wallet products and services, when you use the OGPAY Wallet data application to access your account, or when you call our sales or support associates. Modern information and communication technologies play a fundamental role in the activities of an organization like OGPAY Wallet. Please take a moment to read the following to learn more about our information practices, including what type of information is gathered, how the information is used and for what purposes, to whom we disclose the information, and how we safeguard your personal information. Your privacy is a priority at OGPAY Wallet, and we go to great lengths to protect it. OGPAY Wallet is based in United States. The OGPAY Wallet privacy policy covers the OGPAY Wallet website.
OGPAY Wallet principal activities are:

1. Mobile Wallet
2. Prepaid Debit Cards
3. Mobile Commerce
4. Mobile Data Applications

We revise this Privacy Statement from time to time to reflect changes to our business, Services, or applicable laws. If the revised version requires notice in accordance with applicable law, we will provide you with 30 days prior notice by posting notice of the change on the Policy Updates page of our website in the knowledge center legal page, otherwise the revised Privacy Statement will be effective as of the published effective date.

PROVIDING VISITORS WITH ANONYMOUS ACCESS

You can access our website's home page and browse our sites without disclosing your personal data. Our Services may be accessed by individuals without a OGPAY Wallet account. We will collect Personal Information from you even if you are a non-account holder when you use our Services, such as when a non-accountholder receives a refer a friend SMS or email and a request funds request from a OGPAY account holder ("Recipient"). We may link your transaction information to the OGPAY account holders' transaction history if you accept the request and complete the payment by creating a OGPAY account later.

THE SERVICES AND LINKS OF OUR WEBSITES

Our websites do not enable our visitors to communicate with other visitors or to post information to be accessed by others. Our websites do not include links to third party web service providers.

AUTOMATIC COLLECTION OF INFORMATION

We automatically log personal data by means such as programming or we link information automatically logged by such means with personal data about specific individuals. We do so for the following purposes:

1. Technical administration of the Website
2. Research and development
3. Customer administration

We use cookies to store personal data, or we link information stored in cookies with personal data about specific individuals. We do so for the following purposes:

1. Technical administration of the Web site
2. Customer administration

DATA COLLECTION AND PURPOSE SPECIFICATION

We collect the personal data that you may volunteer while using our services. We may also collect information about you from other sources, such as public records or bodies, or private organizations' access the table of personal data collected and purposes for which they are used, please click here We may collect and use personal data for the additional purposes of:

- **Personal Identifiers**: Such as name, Business Name, Address, Phone Number, Email, IP address, Device Information, Information collected from cookies or other tracking technologies, other information necessary to establish an account or profile.
- **Records and Financial Information:** Such as, bank account and routing numbers, credit and debit card information, amount you send or request, other financial information.
- **Commercial Information:** Such as online shopping cart information, shopping activity on merchant sites, purchase history, order tracking and product information.
- **Geolocation:** We may collect IP-based geolocation data and Global Positioning System (GPS) with your consent during your user experience or based on your mobile application settings.
- **Internet or network activity:** interactions with our Services, Information about response time for web pages, download errors, date, and time when you used the service, Location Information, such as your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing information collected through Cookies ("**Technical Usage Data**")
- **Biometric:** When you consent in the user experience, we collect voice identification, photo identification or face scans to verify your identify and authenticate you for certain actions related to your account, including, for example, verify your identity and authenticate you to meet regulatory requirements or before you access accounts and Services, recover passwords, update profile info, manage payments and payment methods, lift account limitations, and initiate cryptocurrency transfers.
- **Audio, electronic, visual, or similar information:** Call recordings when you talk to customer service.
- **Professional or employment information:** including business information, job title, contact emails, phone numbers and taxpayer ID numbers.

- **Imported Contact Information:** including name, address, phone number, images, email address or usernames associated with the contacts.
- **OGPAY Account Profile Information:** username, profile picture, gender, or personal description which you add that may include sensitive Personal Information.
- **Inferred data:** We may infer information about you such as your preferences and shopping behavior, based on your transactions and interactions with our Services.
- **Characteristics of Protected Classifications:** including age or date of birth, national origin, disability, citizenship, military status.
- **Sensitive Personal Information:** Social Security number, government-issued identification, bank account and routing numbers, credit and debit card information, voice identification and Photo IDs or Precise Geolocation
- Information from your device: including, language settings, browser ID, cookie preferences, time zone, operating system, platform, screen resolution and similar information about your device settings, data collected from cookies or other tracking technologies.

We may also obtain the above categories of Personal Information from the following categories of sources:

- OGPAY Wallet Websites
- Third parties: including Service Providers, Partners and Merchants, Payment Partners, such as card networks and payment processors, Credit Reporting Agencies, Government Entities, Data Brokers, and Financial Institutions
- Linked Accounts: Non-financial or financial accounts you agree to link to OGPAY, such as social network accounts, mail accounts or for open banking. You may change your mind about use of this feature and unlink your linked accounts at any time. If you choose to link these accounts or share such information with us, we will periodically collect and process it until you unlink the account.
- Third Party Applications: Applications that you choose to use for example, the Apple App Store, Google Play Store, or social networking sites.

If we wish to use your personal data for a new purpose, we offer you the means to consent to this new purpose: by indicating in a box at the point on the site where personal data is collected.

HOW IS PERSONAL INFORMATION USED?

We may process your Personal Information for a variety of reasons, including to provide our Services, for security and fraud prevention and to comply with law. We may also use personal data with your consent to participate in certain features that while not necessary for use of the Services may be of interest to you, such as syncing your contact list to your account or connecting to a third-party platform.

We may collect Personal Information to:

- **Provide our Services:** such as to help you send, receive or request money, initiate a payment, add monetary value to an account, pay a bill, administer your purchases, account and payment information, send and receive mobile wallet transactions, to assess your creditworthiness in connection with our Services, confirm your identity and your contact information, to

authenticate your access to your account and to confirm your account or profile and financial information is accurate and up to date.

- **Manage and improve our Services:** for example, to develop new products and features, for customer analysis, to administer our Services, and for internal operations, for example troubleshooting, data analysis, testing, research, and statistical purposes.
- **Manage fraud and risk:** We conduct risk analysis, fraud prevention and risk management to protect our customers and business, including fraud that involves our Partners and Merchants and strategic ventures.
- **Communicate with you:** We may contact you when you need us, such as answering a question you sent to our customer service team.
- **Comply with Laws:** to comply with applicable laws and rules and enforce our agreements with you and other people who use our Services.
- **Process information about your contacts:** to make it easy for you to find and connect with them, improve payment accuracy, and suggest connections with people you may know. **By providing us with information about your contacts you certify that you have permission to provide that information to OGPAY for the purposes described in this Privacy Policy.**
- **Create an account connection between your account and a third-party account or platform:** such as with a social media account or a financial institution in connection with your participation in Open Banking.
- **Send you locally relevant options:** If you agree to let us track your location, we can enhance your security of our Services and customize our Services by using the right language and personalizing content such as providing location-specific options, functionality or offers, ads and search results.
- **Remember your preferences:** We may remember your preferences for the next time you use the Services, such as whether you choose to receive digital receipts via email or text when you checkout.

DO WE DISCLOSE PERSONAL INFORMATION AND WHY?

We do not sell Personal Information to third parties for money or share your Personal Information for cross context behavioral advertising, including any Sensitive Personal Information. However, we will disclose your Personal Information with third parties to help us provide Services, protect our customers from risk and fraud, market our products, and comply with legal obligations.

In addition, we may disclose Personal Information with:

- **Authorities**, when accompanied by a subpoena or other legal documentation that requires OGPAY to respond. Such authorities include courts, governments, law enforcement, and regulators. We may also be required to provide other third parties information about your use of our Services, for example to comply with card association rules, to investigate or enforce violations of our user agreement or to prevent physical harm or illegal activity.
- **Other financial institutions** jointly offer a product, such as Credit, Savings, Cashback, VISA, Mastercard and our banking partners.
- **Card networks and payment processors,** to facilitate payment processing or to add cards to your mobile wallet. For payment transactions your Personal Information and mobile number will be shared with the provider of the payment services for the participating Partner and Merchant

to enable the processing of the payment transaction. The payment provider for the Partner and Merchant may be OGPAY or a third-party payment provider.

- **Fraud prevention and identity verification agencies**, for example to assist us in detecting activities suggestive of fraud.
- **Credit reporting and debt collection agencies,** for example to collect unpaid overdue debts through a third party such as a debt collection agency.
- **Service providers** that operate at our direction and on our behalf to perform services we outsource to them, such as processing payments, marketing, research, compliance, audits, corporate governance, communications, IT development, maintenance, hosting and support and customer service operations.
- **Other OGPAY Account Holders to complete a transaction**. Some Personal Information is disclosed to other OGPAY account holders as required to complete a payment transaction. This includes your username, profile photo, first and last name, email, and phone number.
- **Linked accounts**, for example when you link an account with another bank or **financial institutions,** card account, or aggregator **in connection with your participation in Open Banking**, so we can check if you have sufficient funds or confirm your ownership of the account.
- **Partners and Merchants, their service providers and others involved in a transaction**, for example when you use the Services to initiate online purchases, save your payment information within our Marketplace, pay other Users using the Services, or return goods we may disclose information about you and your account or Mobile Wallet with the other parties (or their service providers) involved in processing your transactions. Please note that Personal Information disclosed to Partners and Merchants (or their service providers) involved in a transaction is subject to the Partners' and Merchants' own privacy policies and procedures. We may also disclose Personal Information to Partners and Merchants to enable their use of our Services with those Partners and Merchants.
- **Other third parties**, for example we disclose Personal Information to advertising platforms at your direction, or security service providers to help prevent unauthorized access to our Services. **Please be aware that these parties' privacy notice applies to the Personal Information that you share directly with them**. For example, we use Google's reCAPTCHA to prevent misuse of our Services, when you access our mobile application. We may also use Google Address Autofill to ensure accuracy of your address. Google's **Privacy Policy** and **Terms of Use** apply to the Personal Information you share with them.
- **Buyers or in connection with business transfer***,* for example if we are involved in a merger, a purchase or sale of all or part of our business or assets, including receivables and debts, we may disclose, under appropriate data protection terms, your Personal Information to an interested or actual buyer of those business or assets. If OGPAY or a significant portion of OGPAY assets are acquired by a third party, Personal Information may also be disclosed.

We may disclose your sensitive personal information as appropriate to carry out legitimate business activities allowed by law.

HOW LONG DOES OGPAY STORE YOUR PERSONAL INFORMATION?

We retain Personal Information for as long as needed or permitted in context of the purpose for which it was collected and consistent with applicable law.

The criteria used to determine our retention period is as follows:

- Personal Information used for the ongoing relationship between you and OGPAY is stored for the duration of the relationship plus a period of 10 years, unless we need to keep it longer, such as:
- a legal obligation or compliance with laws to which we are subject is retained consistent with the applicable law, such as under applicable bankruptcy laws and AML obligations.
- litigation, investigations, audit, and compliance practices, or to protect against legal claims.

We retain biometric data for as long as needed or permitted given the purpose for which it was collected and no more than 3 years after your account closes, unless otherwise required by applicable law.

HOW DO WE USE COOKIES AND TRACKING TECHNOLOGIES?

When you interact with our Services, open email we send you, or visit a third-party website for which we provide Services, we and our partners use cookies and other tracking technologies such as pixel tags, web beacons, and widgets (collectively, "Cookies") to recognize you as a user, customize your online experiences and online content, including to serve you interest-based advertising, perform analytics; mitigate risk and prevent potential fraud, and promote trust and safety across our Services.
We use Cookies to collect your device information, internet activity information, and inferences as described above.

You can disable or decline some cookies for our Services. But, since some parts of our service rely on cookies to work, those services could become difficult or impossible to use. Some web browsers have an optional setting called "Do Not Track" (DNT) that lets you opt-out of being tracked by advertisers and some third parties. Because many of our services won't function without tracking data, we do not respond to DNT settings.

YOUR DATA PROTECTION RIGHTS

Your rights to access, correction, deletion, and restriction to use or share your Personal Information. Under applicable data protection law, you have certain rights to how your Personal Information is collected, stored, used, and shared. We recognize the importance of your ability to control the use of your Personal Information and provide several ways for you to exercise your rights to access (right to know), correction, deletion (erasure), and to restrict certain information (right to opt out of sharing and right to limit use and disclosure of sensitive personal information).

We will not deny you services, charge you different prices, or provide you with a different level of service solely for exercising your privacy rights.

You have the right to request a copy of the Personal Information. If you want to make a request to know about the data we've collected about you in the past 12 months, you have choices:

- Log in to your OGPAY account portal and submit a request using the create a trouble ticket feature in the account settings.

- Call or contact us via our customer service number or by email to request that we provide you with the data we've collected.

Your right to correct your Personal Information:

- Log in to your OGPAY account portal and correct information you previously added. For example, you can edit your addresses in your Account settings / Change Address Icon.
- Call or contact us via our customer service number or by email and request that we correct specific information.

Your right to delete your Personal Information:

- Log in to your OGPAY account portal and delete information you previously added. For example, you may delete your non-primary addresses in your Account Change Address Settings.
- Call or Contact Customer Service and request that we delete specific information.
- Close your OGPAY Account.

If you close your OGPAY or request that we delete Personal Information, we still need to keep some Personal Information so we can:

- Complete a transaction, provide goods or services you requested, or comply with our promises to you in the user agreement or other contract you have with us.
- Detect and prevent malicious, fraudulent, or illegal activity.
- Protect your (or another person's) legal rights, including the right to free speech.
- Manage our internal business processes that are reasonably related to your expectations when using our Services.
- Comply with laws and other legal or governmental processes.

California also offers a right to opt out of "Selling" and "Sharing" Personal Information. Global Privacy Control setting is a browser setting that notifies website owners of users' privacy preferences regarding selling or sharing their personal information. OGPAY does not respond to these settings because we do not sell or share data. Some Personal Information collected, processed, or disclosed by a financial institution are subject to federal laws, such as the Gramm-Leach-Bliley Act.

Understanding your choices

You can control how Personal Information is collected or disclosed, as well as how we communicate with you. Here are some of the ways you can customize your choices.

Choose how we collect Personal Information

You may choose to limit the Personal Information you provide when our apps or Services request it. To help make choices that are right for you, it's important to understand that Personal Information helps us provide a richer, more personalized experience for you. Also, some Personal Information is required for our Services to function at all.

For example, sharing your contacts helps make it easier for you to find the people you want to send money to. If you choose not to share your contacts with us, you can still use our mobile apps, but some actions may not be as fast or easy as it would be if shared your contacts. If you choose not to provide information that is required for an account to function, like your name and email address, we will not be able to create an account for you.

Choose how linked accounts collect and use Personal Information

If you link your account to a third-party service, you may be able to manage how your Personal Information is collected, used, and shared by them. Read the third parties' privacy policies to see the choices they offer you.

You can control which third-party services you link to your account and what Personal Information they can collect about you. For example, to manage the permissions, go to the Security settings in your OGPAY account.

Choose what we disclose with other Users
Some Personal Information may be seen by other Users. You may be able to adjust or turn off this setting in the privacy section in your account settings.

Choose how we communicate with you
Your choices about how we communicate with you differ depending on the purpose of the message and how it is delivered. Some messages are considered optional, and some are necessary for you to manage your accounts with us. We use email, text messages, push notifications on your mobile device, and even phone calls or paper mail depending on the situation and your preferences. You can click the unsubscribe link in a OGPAY marketing email, opt out of a text message by replying "STOP," or turn off notifications on your device. You can also change your account's notification settings or the notification preferences on your device.

You won't be able to opt out of messages that are considered necessary for the Services, such as digital receipts and emails that alert you to changes in your account profile status. You may be able to decide how we send those messages, such as by email, phone, text message, or a notification on your mobile device.

HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We maintain technical, physical, and administrative security measures designed to provide reasonable protection for your Personal Information against loss, misuse, unauthorized access, disclosure, and alteration. The security measures include firewalls, data encryption, physical access controls to our data centers, and information access authorization controls. While we are dedicated to securing our systems and Services, you are responsible for securing and maintaining the privacy of your password(s) and account profile registration information and verifying that the Personal Information we maintain about you is accurate and current. We are not responsible for protecting any Personal Information that we share with a third-party based on a linked account connection that you have authorized.

CHILDREN'S PRIVACY

We do not knowingly collect personal data from children: including Personal Information, from children under the age of 13 or other individuals who are not legally able to use our Services. If we obtain actual knowledge that we have collected Personal Information from someone not allowed to use our Services, we will promptly delete it, unless we are legally obligated to retain such data.

We take specific steps to protect the privacy of children by:

1. Making reasonable efforts to ensure that a parent has authorized the collection of the child's personal data and use of the child's personal data for the disclosure to third parties.
2. Giving parents the option to consent to the collection and use of the child's personal data for our internal use and use of the child's personal data for the disclosure to third parties.

Additionally, to ensure that children's privacy is respected on our Web site, we:

1. We verify the age of the person signing up for an account prior to processing the application.

We do provide information about our personal data practices in relation to children on our home page and wherever we knowingly collect personal data from children on our Web site. Please contact us if you believe that we have mistakenly or unintentionally collected information from someone not allowed to use our Services.

CALIFORNIA PRIVACY NOTICE OF COLLECTION

Under the laws of California and certain other US states (i.e., Virginia), we are required to provide you with the following additional information about: (1) the purpose for which we use each category of "personal information" we collect; and (2) the categories of third parties to which we (a) disclose such personal information for a business purpose, (b) "share" personal information for "cross-context behavioral advertising," and/or (c) "sell" such personal information.

Under California law, "sharing" is defined as the targeting of advertising to a consumer based on that consumer's personal information obtained from the consumer's activity across websites, and "selling" is defined as the disclosure of personal information to third parties in exchange for monetary or other valuable consideration. **We do not sell or share your Personal Information, including any Sensitive Personal Information.** We also do not sell or share and have no actual knowledge that we have sold or shared any Personal Information of anyone under 16 years of age.

For more information about each category, purpose of use, and the third parties to which we disclose information, please see the "Categories of Personal Information We Collect", "How is Personal Information used," and "Do We Disclose Personal Information" sections.

US CONSUMER PRIVACY NOTICE

The following Consumer Privacy Notice applies to you if you are an individual who resides in the United States and uses OGPAY Services for your own personal, family, or household purposes.

CONFIDENTIALITY / SECURITY

We give you the option of using a secure transmission method to send us the following types of personal data:

1. Primary personal data (such as name and contact details)
2. Other personal and profiling data (such as physical description, leisure activities)
3. Identifiers (such as credit card details, Web site password)
4. Specific personal data (such as racial or ethnic origin, religious beliefs, medical data)

We have implemented security policies, rules, and technical measures to protect the personal data that we have under our control from:

1. Unauthorized access
2. Improper use or disclosure
3. Unauthorized modification
4. Unlawful destruction or accidental loss

All our employees and data processors, who have access to, and are associated with the processing of personal data, are obliged to respect the confidentiality of our visitors' personal data. We ensure that your personal data will not be disclosed to State institutions and authorities except if required by law or other regulation. To access the personal data we may hold about you, you can ask us, by sending an email to support@ogpay.com. We will provide you with a readable copy of the personal data which we keep about you, within a month. - although we may before require proof of your identity -. We will provide the information at a charge of $15.00. We allow you to challenge the data that we hold about you and, where appropriate, you may have the data:

1. Rectified or amended.
2. Completed

We reserve the right to refuse to provide our visitors with a copy of their personal data but will give reasons for our refusal. We do, however, allow you to challenge our decision to refuse to provide you with a copy of your personal data.

DISCLOSURE OF PRIVATE DATA

There are also times when it may be advantageous for OGPAY Wallet to make certain personal information about you available to companies that OGPAY Wallet has a strategic relationship with or that perform work for OGPAY Wallet to provide products and services to you on our behalf. These companies may help us process information, extend credit, fulfill customer orders, deliver products to you, manage and enhance customer data, provide customer service, assess your interest in our products and services, or conduct customer research or satisfaction surveys.
At times we may be required by law or litigation to disclose your personal information. We may also disclose information about you if we determine that for national security, law enforcement, or other issues of public importance, disclosure is necessary.

PRIVACY COMPLIANCE

Our privacy policy is compliant with the following instrument: OECD Privacy United States There are no global or regional regulatory or self-regulatory schemes applicable to our web site or organization. To demonstrate that our privacy policy accords with the above privacy instruments, we are:

1. Voluntarily committed to a Self-Assessment procedure

2. Voluntarily committed to a Third-Party Organization certification

PRIVACY SUPPORT

OGPAY
Customer Service

Phone Number: 800-882-2314
Email Address: support@ogpay.com