

Compass Payment Solutions, LLC
Privacy Statement

We care about your privacy and are committed to processing your personal information in accordance with fair information practices and applicable data protection laws to better serve you.

At CPS, we are committed to helping our customers move their money to make things happen for you. This commitment to our customers includes doing the right thing with their personal information.

The purpose of our Privacy Statement is to explain how we collect, use, store, protect, disclose, and share your personal information when you use any of our services online through our website, in retail, and through our mobile apps, as well as to inform you of your choices about the way your information is collected and used.

PERSONAL INFORMATION

When you use our money transfer or other payment services; open and maintain an account with us; contact us; access our websites or applications; (collectively, the “Services”), we collect personal information about you and may use it along with other information collected or generated during our relationship with you. We collect different types of personal information relating to you, which may include:

- Basic personal information such as your name, contact information (for example, your postal address, email address, telephone number), photo or other image of you, place of birth, date of birth, gender, citizenship, occupation, marital status, and government or national identification numbers and accompanying documentation.
- Financial and transactional information such as your money transfers, payments, deposits and the source/destination of funds for each, information about how you use of our Services, bank and credit information, and employer information.
- Name and contact information relating to recipients to whom you send or from whom you request or receive money or with whom you otherwise choose to transact when using the

Services; Technical information such as the host from which you access the internet, your IP address or device advertising ID, geolocation if enabled, information about your device (such as device properties, settings, applications, storage and usage information), mobile application, browser and operating system software, social profile and network information, the date and time you access our websites, and the address of the site from which you linked to our website when you visit us. We collect personal information on your online activities as described in the section titled “INTERNET TECHNOLOGIES.”;

- Sensitive or special categories of information such as biometric information used to uniquely identify you (for example fingerprints or facial recognition) or criminal conviction information. We will only hold this data when we need to for the purposes of the Services we provide to you, where we are processing the data for a substantial public interest, where we have a legal obligation, or where we have your consent to do so.
- If you link, connect, or login to Compass websites or mobile applications using a third-party service (e.g. Google and Facebook), you direct the service to send us information such as your name, email address, profile picture and other information as controlled by that service or as authorized by you via your privacy settings with that service.

HOW COMPASS PAYMENT SOLUTIONS COLLECTS PERSONAL INFORMATION

Compass Payment Solutions collects your personal information in several ways:

- Information you give to us in person, online including through transaction forms, registrations for our bank accounts, interactions with Compass Payment Solutions and business partners.
- Information you provide to us while we provide customer support or consultation, including using email, postal mail, or live chat.
- Information that others may provide about you through the use of our Services; Information we learn about you through the use of our Services.
- Through automated means such as communications protocols, email communications, and cookies or similar INTERNET TECHNOLOGIES.
- Through our vendors, fraud risk management companies, law enforcement bodies, commercial and public data sources and other lawful third-party data sources we use to augment our customer information.

- Through your use of social media; and

HOW COMPASS PAYMENT SOLUTIONS SECURES YOUR PERSONAL INFORMATION

We are committed to the security of your personal information. We use organizational, technical, and administrative safeguards that comply with applicable government laws and regulations to secure your personal information. We also endeavor to restrict access to the personal information that we process to only our employees, agents, and representatives that have a business need to know it. Despite our efforts, third parties may unlawfully intercept or access your personal information.

INTERNET TECHNOLOGIES

We use internet technologies like cookies, tags, and web beacons on our websites, where we provide online Services for a variety of purposes, including, but not limited to, those identified in the section titled “HOW COMPASS PAYMENT SOLUTIONS USES THE PERSONAL INFORMATION IT COLLECTS”.

For more information on how we use cookies please click the “Cookie Information” link in the footer of the applicable Compass Payment Solutions webpage. In certain regions we have implemented the capability for the user to manage cookies on our websites; where available, we will only read or write cookies based on your preference level.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

HOW COMPASS PAYMENT SOLUTIONS USES THE PERSONAL INFORMATION COLLECTS

We utilize the personal information we collect for the following commercial purposes. Failure to provide some of your personal information may affect our ability to provide our Services to you:

- Performing the Services: To assist us in providing Services and customer support to you, to help you to receive a personalized experience, to assist you in carrying out transactions and accessing account information, and to associate your personal information when

you use multiple Services.

- **Communication:** To contact you with information relevant to the Services you use or the loyalty programs you participate in, to answer questions or respond to other requests you send to our customer service teams, or to market to you based on your preferences;
- **Authentication:** To recognize you and to allow you to remain signed-in during your use of the Services without having to re-enter your password.
- **Analytics:** To perform analytics on understanding our customers, improving their experience; **Web Traffic Analysis:** To determine whether you came to a Compass Payment Solutions website from an online ad, partner, or an affiliate; or have clicked an advertisement or link on one of our websites; **Advertising:** To deliver information specific to your interests on non-Compass Payment Solutions websites and applications.
- **Analysis of Promotions:** To better understand the effectiveness of our promotional campaigns and whether you acted on our promotional messages.
- **Prevention of Fraud, Financial Crime (including money laundering), and Other Unlawful Activity:** To promote safety, reduce financial risk, and combat fraud across our Services and, as necessary, to ensure the effectiveness of our compliance processes aimed at such prevention of criminal activity.

LAWFUL BASES UPON WHICH WE USE YOUR PERSONAL INFORMATION

We may use your personal information as explained elsewhere in this Statement for each of the following lawful bases:

- We use your personal information to provide our Services to you: This includes using personal information necessary for providing banking services, conducting money transfers, payment services, we may use this information in the performance of a contract with you or for taking steps to enter into a contract for any of the above or for any other Compass Payment Solutions products or services.
- We use your personal information for legitimate business purposes, where these legitimate business purposes do not outweigh the rights and freedoms of the individuals whose data we process: This includes using personal information to analyze and improve

our products, locations, services, operations, the running of this site and your customer experience, and for measuring marketing return on investment and brand satisfaction. This may include using your information to conduct market research surveys. We may also use your personal information to provide customer services and to help protect the security and integrity of our technology, systems, and services. It may also include the prevention of fraud, money laundering, and other unlawful activity, or the establishment or defense of a legal claim,

- We use your personal information for legal and compliance purposes: This includes using personal information needed to comply with legal and regulatory duties related to anti-money laundering, counter-terrorist financing, and other financial regulations; detection, prevention and prosecution of fraud and theft; as well as preventing illegitimate or prohibited use of our Services or other illegal or wrongful activity and operating a global compliance program for doing so. This may also include establishing, exercising, or defending legal rights and claims of Compass Payment Solutions and others, and monitoring and reporting compliance issues. This may further include using your personal information to validate and authenticate your identity and utilizing third parties to help us do so. We may process your personal information based on your consent as outlined in this Statement: This includes consent for receiving marketing communications, or where otherwise required by applicable law. If we request your consent, we will inform you of the intended purposes for which your information will be processed.
- We will inform you when your information is required to provide the Services you request or is required by law. In certain cases, such as performing money transfer and banking services, we may be unable to provide you with our Services unless you provide certain personal information.

INFORMATION FROM CHILDREN OR MINORS

We do not direct our Services or products at children under the age of 18. We do not knowingly collect or maintain information from our retail, website, or mobile apps from persons under the age of 18.

WHO COMPASS PAYMENT SOLUTIONS SHARES YOUR PERSONAL INFORMATION WITH

For any of the purposes listed in this Statement, we may disclose applicable personal information including, but not limited to, your name, contact information, national identification number and/or related documentation, customer ID number, address, transaction details and patterns, and bank account information to the following types of organizations or parties:

Required local remittance licensing entities relevant to a transaction:

- Our agents or business partners who facilitate the money transfer or payment transaction or other specific Services you have requested.
- Vendors, payments processors, banking partners, and data processors contracted to provide business and customer services.
- Services providers, based on your consent where applicable, including those that provide marketing services, advertising services, shopping services related to our loyalty programs, and customer satisfaction and market research services on our behalf. Such sharing may include sharing with third parties (such as social media companies) to facilitate more relevant and targeted advertising.
- Vendors and data processors contracted to help us validate the accuracy of the information provided by you, and to authenticate your identity and manage risks related to security, fraud, and identity.
- Third parties that you have authorized to access your account and/or your account information in order to perform Services for you, such as account information service providers and payment initiation service providers. If you are a customer of a Service that allows for a public profile, you may choose to make your profile publicly visible. This may include sharing limited personal details such as name, photo of you, available currencies of your account, and the fact that you are a customer.

We may transmit personal information we possess in connection with a sale or transfer of all

or part of our business. We may also disclose your personal information globally, as required or permitted by applicable laws and regulations, to regulatory and financial authorities, credit reporting agencies, law enforcement bodies, courts, governments, or government agencies to meet compliance and legal obligations or to assert or defend the rights and interests of Compass Payment Solutions or others.

INTERNATIONAL TRANSFERS OF PERSONAL INFORMATION

We transfer your personal information to parties in countries outside the country it was collected, including but not limited to the USA, as permitted, or required by applicable law, regulatory authorities, law enforcement, and government agencies. Additionally, when you send or receive money to or from another country, we will also be required to share some of your personal information with that country as required or permitted by law. We transfer certain personal information about you to our data centers located in the USA or within a region as required by local law and process it to fulfil our legal and compliance obligations which apply to our Services. We also store certain personal information we collect based on your marketing choices in the US. By using the Services, you acknowledge that such transfers of information outside of your country of residence may occur.

RETENTION OF PERSONAL INFORMATION

Your personal information will be retained in accordance with statutory periods contained in regulations applicable to financial transactions and accounts including those in anti-money laundering, anti-terrorist financing and other laws applicable to us. Otherwise, we will retain your information only if necessary for the specific purposes for which it was collected, or to resolve any query you may raise. We subscribe to data minimization principles and strive to retain information for no longer than necessary for the purpose(s) for which it was obtained.

ACCESSING, DELETING AND CORRECTING YOUR PERSONAL INFORMATION AND CHANGING YOUR CHOICES

You have the right to know if we are processing your personal information and to ask us for a copy of your information free of charge. You have the right to request a structured and

machine-readable copy of certain information you have provided to us. We may charge you a reasonable fee for providing the information, or not act upon your request, if the request is manifestly unfounded or excessive. If you use our Services online or via mobile app, you may log into your account at any time to access your statements, transactional information, and certain personal information.

You have the right to stop us from sending you marketing communications. You have the right to ask us to correct information about you that is incomplete, inaccurate, or out-of-date. You have the right to ask us to delete certain information about you, to restrict certain uses of information relating to you, and to object to certain uses of it. To the extent we are processing personal information based on your consent, you may withdraw your consent as permitted by applicable law. If you are a registered user of CompassPayment.net as a digital money transfer consumer, you may also visit CompassPayment.net and edit your profile settings to change your marketing communications and third-party data sharing preferences. You also have the right to lodge a complaint with a relevant data protection regulator or supervisory authority about our processing of personal information. When we receive a request, we may ask for additional information from you to verify your identity and as a security measure to protect your personal information. In some situations, we may refuse to act or may impose limitations on your rights, as permitted by applicable law. To exercise these rights, please contact Compass Payment Solutions through the section titled “CONTACTING US”. We will endeavor to respond to your request within 30 days, but response time may vary depending on the laws and regulations applicable to your request, and we may be entitled to extend this period in certain circumstances. We will comply with your request to the extent required by applicable law.

Additional rights may also be available in various jurisdictions under local laws. These will be accessible via the means provided above.

CONTACTING US

If you have a question or complaint about how we handle your personal information, we ask that you put your inquiry in writing. We will investigate your inquiry and generally respond to you

in writing within 30 days of receipt.

To contact us via a toll-free or local phone number, please click the “Contact Us” link in the footer of the applicable Compass Payment Solutions webpage to find contact information specific to your region.

CHANGES

We reserve the right to modify this Privacy Statement. Updated privacy statements will be posted on this Website when amendments occur. We urge you to review this Privacy Statement when you visit to obtain the most current statement.

For more information you can email compliance@compay.net