



YAPSTONE™  
POWERING PAYMENTS

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## Privacy Policy

Thank you for visiting a website owned by YapStone, Inc. (“we”, “us” and “our”). Your privacy is important to us. In order to better protect your privacy, we have developed this privacy policy (“Privacy Policy”). The Privacy Policy explains our information practices and the choices you can make about the way your information is collected and used at this website and our services. The Privacy Policy is based on these principles:

- We will disclose how we use the information we collect;
- We will give you an opportunity to restrict our use of the information;
- We will give you an opportunity to tell us not to give the information to others; and
- We will give you an opportunity to correct the information in our records when it has been erroneously recorded.

These principles and our policy apply whether we collect the information by paper, online or as part of you making a payment.

This Privacy Policy (together with our website Terms of Service, agreements we may have entered into with you, disclosures made at the time we collected your information, and any other policies published on our websites) sets out the basis on which any personal or business data (“Personal Data”) we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

By visiting YapStone websites or otherwise submitting information to us, you consent that your data may be used in accordance with the terms of this Privacy Policy.

### 1. Information We May Collect from You

We may collect and process the following data about you:

1. Information that you provide by filling in forms, applications, or provide to us to facilitate our customer due diligence procedures. This includes personally identifiable information (PII), information provided at the time of registering for our services, engaging in a transaction, establishing reoccurring transactions, or requesting further services. We may also ask you for information when you report a problem with our website.
2. If you contact us, we may keep a record of that correspondence regardless of the means.
3. We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
4. Details of transactions you carry out through our services and of the fulfillment of your transactions.

5. Details of your visits to our websites including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own purposes or otherwise and the resources that you access.
6. When you initiate a payment transaction, we also collect financial information such as credit card, debit card, or bank account details. We do so in accordance with the highest level of the Payment Card Industry Data Security Standard (PCI-DSS), as YapStone is a Level One provider.
7. For verification purposes we reserve the right to request proof of identification in an offline format. This may include passport, driver's license, proof of ownership, utility bill, business data, or other items we deem necessary to establish identity, residence, or place of business. Such proofs of identification may be stored electronically on our servers in order to comply with our legal and regulatory obligations.
8. Your IP address, computer or device information including device-specific parameters, and access times may be tracked. We do this to prevent fraud, establish your identity, and provide promotional information which may be of interest to you.
9. Data necessary to detect and prevent fraud may be collected and compiled; we will either do this directly or in conjunction with a third-party who use this data to detect and protect against fraud ("third-party experts"). These third-party experts are subject to privacy and confidentiality obligations.
10. Competitions, promotions, or giveaways may be made available on our websites or through third parties from time to time. You do not have to participate in these. However, if choose to you may be asked to disclose some personal information. At the time of entering the promotion, we will disclose in its specific Terms and Conditions how your personal information will be used. Please do not participate in any promotion if you do not agree to such usage.

## 2. IP Addresses, Cookies, Tags, Online Tracking, and Click-through URLs

We may collect information about your computer, including where available your IP address, operating system and browser type. Used for system administration, to perform fraud and risk checks, and to report aggregate information to our partners, this is statistical data about our users' browsing actions and patterns, and may include IP or device information, this data does not identify any individual. We will not sell or rent the information collected to third parties for their marketing purposes. We may however share the information with partners to provide ads related to YapStone's services after you have visited one of our websites.

For the same reasons, we may obtain information about your general Internet usage by using cookies. Cookies contain information that is transferred to your computer's hard drive. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser, and stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. They help us to improve our website and to deliver a better and more personalized service. They enable us:

1. To estimate our audience size and usage pattern.
2. To store information about your preferences, and to allow us to customize our website according to your individual interests.
3. To speed up the delivery of pages you commonly use.
4. To recognize you when you return to our website.
5. To verify your identity.
6. To prevent fraud.

We may use both “*session*” cookies and “*persistent*” cookies on our website. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date. You may refuse to accept cookies by activating the setting on your browser that allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our website.

We may use third-party cookies to help us improve our website design, user experience and to provide you with information about YapStone through trusted remarking services. Please note that our partners may also use cookies, over which we have no control. Please also note that third-parties may be able to uniquely identify your device or browser even if you have disabled cookies.

We may occasionally use a “**click-through URL**”. When you click one of these URLs, you pass through our web server before arriving at your final destination. We track click-throughs to help us improve the user experience, determine your interest in particular topics and measure the effectiveness of our customer communications.

Some web browsers permit you to set Do Not Track (DNT) signals which would prevent websites from tracking your behavior online. The applicable standards are still being developed and as a result, we cannot respond to the DNT signal. This means our service providers are able to compile analytics about your movements on our website and remarket YapStone services to you.

Please be aware that YapStone is not responsible for the privacy practices of other sites. We encourage our users to be aware when they leave our website to read the privacy statements of each and every website that collects personally identifiable information.

### 3. Where We Store Your Personal Data

The data that we collect from you will be processed and stored in the United States. By submitting your personal data, you agree to the transfer, storing, or processing in the United States. YapStone will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy. All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our service or engage with our customer service team, you are responsible for keeping this password confidential and adequately complex. We ask you not to share a password with anyone and change your password every 90 days.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

### 4. Uses Made of the Information

We use information held about you in the following ways:

1. To ensure that content from our websites is presented in the most effective manner for you and for your computer.
2. To allow smooth interaction between you and customer support.

3. To provide you with information directly or through third-parties about our products or services or third-party products or services which may be of interest to you.
4. To carry out our and your obligations arising from any contracts entered into between you and us, or, if you are a renter, between us and the property owner.
5. To allow you to participate in interactive features of our service, when you choose to do so.
6. To notify you about changes to our services.
7. To perform the necessary due diligence on our customers to ensure you are who you say you are, and to reduce the risks of chargebacks and fraud in our system.
8. To build fraud and credit risk models to assist in the screening of users for the purposes of identifying fraudsters, preventing fraud, and minimizing associated credit risk.
9. To help safeguard financial data and our systems by using and making select information accessible to third-party experts, who use databases and proprietary algorithms to detect fraudulent activity.

We will not disclose your information to any other third parties except with your explicit permission or as permitted in section 5 of the Privacy Policy.

## 5. Disclosure of Your Information

We may disclose your personal information to any member of the YapStone group of companies. We may disclose your personal information to third parties:

1. In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
2. If YapStone International Limited, or YapStone, Inc. or substantially all of their assets are acquired by a third party, in which case personal data held by it about customers may be one of the transferred assets.
3. In order: (i) to comply with any legal obligation (including but not limited to reporting obligations under fraud, anti-money laundering, and counter terrorist financing law); (ii) to order, enforce or apply the Terms of Service or your written agreement with us, including the collection of any amounts and fees incidental to the collection of these amounts owed by you under such agreement, which may be done directly or through a third party via email, telephone, or regular mail; or (iii) to protect the rights, property, or safety of YapStone, or one of YapStone's group companies, our customers, or others.
4. For purposes of marketing YapStone's services.
5. For the purposes of fraud and risk protection, either directly or with the assistance of third-party experts.
6. For the purposes of preventing and monitoring for money laundering or other illegal activity.
7. In the event a third party provides services to us that facilitate the provision of our services to you.
8. Pursuant to a valid request or subpoena from law enforcement, regulators, or other government body.
9. With your permission.

## 6. Remarketing of YapStone's Services

- a. YapStone may partner with third parties to provide you with promotions and advertisements of YapStone's services on YapStone's behalf. This service is called "remarketing". The service will allow third parties to display YapStone ads or promotions to you if you have previously visited one of YapStone's websites based upon the cookies placed on your computer.

- b. You can prevent remarketing by deleting your cookies or blocking cookies, though certain websites operate more effectively with cookies enabled.
- c. There are some general rules around how remarketing works; here they are:
  - i. We will not use or associate personally identifiable information with remarketing lists, cookies, data feeds, or other anonymous identifiers.
  - ii. We will not use or associate targeting information, such as location, with any personally identifiable information collected from an ad or its landing page.
  - iii. We will not share any personally identifiable information with any partner ad network through our remarketing tag or any ad-associated product data feeds.
  - iv. We do not send precise location information without obtaining your consent.
  - v. We abide by Google's policies for identified [Sensitive Categories](#).
  - vi. We will not modify or obscure any notices an ad network may display to users about the remarketing lists they're on, along with the corresponding domain name.

## 7. Your Rights

Our websites may contain links to and from the websites of our partner networks, advertisers, and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## 8. Changes to the Privacy Policy

Any changes we may make to the Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email one month prior to the change becoming effective. If we are going to use your personal information in a manner different from that stated at the time of collection we will notify you via email, if one was provided to us. You will have a choice whether or not to allow us to use your information in this new manner. If you do not contact us stating your refusal to accept the changes to the Privacy Policy within the one month notice period, you will be deemed to have accepted the changes. If you refused to accept the changes, we may be required to shut down or terminate your ability to use the Services. However, if your account with YapStone has been suspended or closed then you will not be contacted and your information will not be used in this new manner.

## 9. Contacting Us and Opting Out of Electronic Communications

Questions, comments, and requests regarding the Privacy Policy are welcomed and should be addressed to: Legal Department, YapStone, Inc., 2033 North Main Street, Suite 510, Walnut Creek, CA 94596.

YapStone believes you should have the ability to prevent unsolicited marketing email communications from us. As a result, you may opt out of receiving certain electronic communications from YapStone. Unfortunately, because we provide an electronic payment service, you may not opt-out of receiving administrative emails and notices. If you wish to opt-out of marketing emails from YapStone, please provide your full name and email address to us at: [Opt-out@yapstone.com](mailto:Opt-out@yapstone.com). If your state requires you to unsubscribe via written notification, please write us at the above address.

For your information, if you do not want to your cookies to be used for marketing, please visit the [Network Advertising Initiative page for opting out of interest-based advertising by participating companies](#). Please

be aware, this does not mean you will not receive any online advertising – it merely means that the companies from which you opted out will no longer deliver ads tailored to your web preferences and patterns.

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