



YAPSTONE™

POWERING PAYMENTS

PRIVACY POLICY –
UNITED STATES

JUNE 6 2017

UNITED STATES 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*”).

Your personal data is being processed by YapStone, Inc. (“*YapStone*”, “*we*”, “*us*” and “*our*”). We provide payments gateway and third-party payment processor and payment services provider services (collectively “*Processing Services*”) through which users of online platforms or online marketplaces make payments.

This Privacy Policy applies to you if you are a property owner, property manager or other payee on whose behalf we perform our Processing Services (“*Merchants*”), an employee or agent of a Merchant, or an individual contracting with a Merchant (or representing a group of individuals contracting with a Merchant) and using our Processing Services to make a payment to that Merchant. This Privacy Policy explains our online information practices and the choices you can make about the way your information is collected and used by YapStone.

The Privacy Policy is based on these principles:

- We will disclose the types of information we collect and how we use it;
- Unless we need to use your information to provide our services to you or to comply with a legal or regulatory requirement:
 - We will give you an opportunity to restrict our use of the information; and
 - 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 Privacy Policy apply whether we collect the information by paper, online or as part of you making a payment.

This Privacy Policy (together with all policies, notices, and other content that appear on (or that are linked to) YapStone’s website(s), including, without limitation any website operated by YapStone, and any subdomain of any such websites or any mobile application for such websites (collectively, “*Websites*” or “*Website*”) sets out the basis on how we process any personal data we receive from you. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Yapstone collects data either directly or via a website, platform, marketplace, software, or other entity that works with YapStone or uses YapStone's services ("**Partners**"), By visiting YapStone websites and/or submitting data to YapStone you acknowledge that our use of your data is necessary for us to comply with applicable law and to provide contracted for processing services (on behalf of Merchants) to facilitate payment by users of online platforms or online marketplaces to Merchants to whom the users owe a payment obligation. We will use your data only in accordance with the terms of this Privacy Policy or as allowed by law.

INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- Information that you provide to us or to one of our Partners or Merchants (such as by filling in webforms, applications, or as part of our customer due diligence procedures), including, for example: information you provide (1) at the time of registering to use our services or services of one of our Partners who provides such data to us; (2) in connection with contracting for or subscribing to the service of one of our Partners or Merchants, content you post on, to or through a Partner or Merchant; (3) in connection with requesting further services from us or any Partner or Merchant; or (4) information you provide when you report a problem to us or any Partner or Merchant in connection with our or their services. Such information may include, for example, your name, email address, property ownership data, bank or credit card account information, address, telephone number, device identification or other sign-on information, geolocation data, and transaction information.
- Information that is automatically collected using technology that allows electronic tracking of technical information; this is further explained below in the section titled IP ADDRESSES, COOKIES AND CLICK-THROUGH URLS;
- If or when you contact us; we may keep a record of that correspondence regardless of the means;
- All responses to optional surveys that you complete;
- Details of the entire lifecycle of transactions you carry out through our services or those of our Partners or Merchants;
- The resources that you access on our Websites or those of our Partners or Merchants, as well as details of your visits to our Websites including, but not limited to, traffic data, location data, weblogs, and other communication data, whether such details are required for our own billing purposes or otherwise;
- Financial information you provide when you initiate a payment transaction, such as credit card, debit card, or bank account details.

- Personal data which we are legally required to report to the authorities for certain payment transactions, such as when the payment transaction(s) volumes reaches a certain limit;
- Proof of your identity which we may request from you for identity verification purposes and to comply with applicable law. This may include collecting copies of your passport, driver's license, utility bill, company information, or other documents we deem necessary to establish your 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;
- Proof of property ownership, verification of bank account, or information that can identify you or verify your identity or location, including your first and last name, telephone number, postal and email addresses, fax number, method of payment information (such as credit card), or the current physical location of you and any device you use to access a Website in connection with the use of our services or those of our Partners or Merchants. Such proof may be stored electronically on our servers in order to comply with our legal and regulatory obligations;
- Your IP address, computer information, and the times of each access to our services or Websites, which may be tracked against your records with us for purposes of preventing fraud, establishing your identity, creating an audit trail when using the services of YapStone, and to comply with applicable laws;
- Data necessary to detect and prevent fraud; 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.
- Information which you provide in response to competitions which may be made available on our website from time to time. You do not have to participate in these; however, if you choose to you may be asked to disclose some personal information. At the time of entering the competition it will be made clear to you who will have access to your personal information and why. You are not obliged to continue with your competition entry; however, if you do so you accept that you may receive a prize.

IP ADDRESSES, COOKIES AND CLICK-THROUGH URLS

We may collect technical information about your computer, including for example, where available, your IP address, operating system, and browser type, for system administration and to report aggregate information to our Partners. This is aggregate statistical data about our users' browsing actions and patterns.

For the same reasons, we may obtain information about your general Internet usage by using a cookie. 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. Cookies contain information that is transferred to your computer's hard drive. 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. Cookies help us to improve our Website and to deliver a better and more personalised service. Cookies enable us:

- To estimate our audience size and usage pattern;
- To store information about your preferences, and to allow us to customise our website according to your individual interests;
- To prevent fraud;
- To speed up the delivery of pages you commonly use; and
- To recognise you when you return to one of our Websites.

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. Disabling a cookie or category of cookies does not delete the cookie from your browser; you will need to do this yourself from within your browser. If you have disabled one or more cookies, we may still use information collected from cookies before your disabled preference was set. We stop, however, using subsequent disabled cookies to collect any further information.

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 remarketing services. We may allow selected third parties to place cookies through the Site to provide us with better insights into the use of the Site or user demographics or to provide relevant advertising to you. These third parties may collect information about a consumer's online activities over time and across different websites when he or she uses our website. Please note that our Partners may also use cookies, over which we have no control but which will be activated if you click through to our Partners' websites. 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.

You can learn more about cookies at the following third-party websites:

- AllAboutCookies: <http://www.allaboutcookies.org/>
- Network Advertising Initiative: <http://www.networkadvertising.org/>

DO NOT TRACK

Some web browsers permit you to set Do Not Track (DNT) signals which would prevent websites from tracking your behaviour 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.

WHERE WE STORE YOUR PERSONAL DATA

The data (including personal data) that we collect from you may be processed, transferred and stored in the United States and may be transferred to, and stored at, a destination outside of the United States including but not limited to: India, Ireland, Switzerland, India, and the Philippines and Ireland. By submitting your personal data, you agree to the transfer, storing, or processing in destinations inside or outside the United States. Your data (including personal data) may also be processed by staff operating outside the United States who work for us or one of our Partners, Merchants or affiliated companies, or one of our third-party suppliers, or third-party service providers. Such staff maybe engaged in, among other things, verifying your identity, your location or payment information, the fulfilment of your transaction, the processing of your payment details, improving our Websites and services, technical support, fraud review, and the provision of other support services or in order to comply with our legal and regulatory obligations, as well as for group administration and management purposes. YapStone complies with applicable data transfer laws.

You acknowledge and agree to the transfer to, and storage or processing inside or outside the United States, including in India, Ireland, Switzerland, and the Philippines, of your personal data, as set out in this Privacy Policy.

SECURITY

YapStone will use reasonable technical, administrative and physical measures to protect information contained in our system against misuse, loss or

alteration. All information you provide to us is stored on our secure servers or secured servers licensed for use by us. YapStone complies with the Payment Card Industry Data Security Standard (PCI-DSS).

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. If we receive instructions using your log-in information we will consider that you have authorized the instructions.

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.

USES MADE OF YOUR INFORMATION

We use information held about you in the following ways:

- To ensure that content from our websites is presented in the most effective manner for you and for your electronic device;
- To allow smooth interaction between you and customer support;
- To allow us to contact you by phone, email, text, or otherwise, about promotions offered by YapStone;
- To provide you with information, products or services which we feel may interest you (whether ours or a third party's) where you have requested this or where you have separately agreed to this;
- To carry out our and your obligations arising from any contracts entered into between you and us;
- To allow us to carry out our contractual obligations to our Partners or our Merchants in connection with providing Processing Services to facilitate payment by users of online platforms or online marketplaces to Merchants to whom the users owe a payment obligation;
- To allow you to participate in interactive features of our service, when you choose to do so;
- To notify you about changes to our services;
- To perform the necessary due diligence on our customers including, for example, information necessary to meet legal Customer Due Diligence, Know Your Customer and Anti-Money Laundering obligations, such as name, date of birth, and current address of individuals and/or beneficial owners of property, photo identification, utility bill copies or similar documents;

- To detect, investigate, prevent, protect against, remediate and reduce the risks of chargebacks and fraud in our system, unauthorized transactions, or activity we think is suspicious or may be potentially illegal, unlawful or harmful, to build fraud and credit risk models to assist in the screening of users for the purposes of identifying fraudsters, preventing fraud and minimising associated credit risk, which may include credit checks under the conditions of local law, sharing of relevant data with vendors to improve our system and services, or sharing such data in order to comply with our legal, regulatory or compliance obligations or assist law enforcement with respect to criminal or suspected criminal acts, including responding to a valid request by a law enforcement agency or regulatory or governmental authority, and use or disclosure of such data or information in connection with actual or proposed litigation, or to protect our or our affiliates' or Partners' property, people and other rights or interests; and
- To enforce our Privacy Policy and/or our Terms or any other purpose referenced herein or therein.

DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any affiliate of YapStone, including, Yapstone Holdings, Inc. and the subsidiaries of Yapstone Holdings, Inc.

We may disclose your data to Partners and third parties:

- Where we have received your information from or via an online portal or marketplace through which you rent your property, in particular disclosures of any updates to your information, including your bank account details, with such online portal or marketplace, who will use this data in accordance with their privacy policy and terms of service as made available to you by them, for the purposes of your continued use of their services, to enforce their policies, defend and protect the rights, property or safety of themselves or other users of their websites or services, to comply with their legal obligations (including reporting to relevant taxing authorities) or in the interest of national security, public interest or law enforcement in any country where they have entities or affiliates. For example, they may respond to a valid request by a law enforcement agency or regulatory or governmental authority, and they may also disclose data in connection with actual or proposed litigation, or to protect their property, people and other rights or interests.
- If you've requested their services or if you've requested to be provided with information by them;
- If you have done (or have agreed to do) business with them;

- To provide you with information about our products or services or about products or services of the third parties or Partners which may be of interest to you.;
- 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;
- If YapStone, Inc., or Yapstone Holdings, Inc. or any of its affiliates, have substantially all of their assets are acquired by a third party, personal data held by it about you may be one of the transferred assets;
- In order: (i) to comply with any legal obligation (including reporting obligations under fraud, anti-money laundering, or counter terrorist financing law and other applicable law and regulations); (ii) in order to enforce or apply the Terms of Service or Terms of Use with respect to our Services or Websites; (iii) in order to enforce or apply provisions of any agreement we have with you; or (iv) to protect the rights, property, or safety of YapStone, or its affiliates, our customers, our users, our Partners, or others;
- For the purposes of fraud protection, credit risk reduction, and the prevention and reporting of money laundering or other criminal or suspected criminal activity, including the building of fraud and credit risk models to assist in the screening of users for the purposes of identifying fraudsters, preventing fraud and minimising associated credit risk for YapStone, its Partners, Merchants and other users of its Services;
- Where such third parties provide services to us that facilitate the provision of our services to you, including for example, credit card issuers, software providers and our financial services partners;
- In order to collect and process data for other companies and your data may be shared back with such company;
- Pursuant to a valid request or subpoena from law enforcement, regulators, court, or other government body;
- In accordance with this privacy policy; and
- With your permission.

REMARKETING OF YAPSTONE'S SERVICES

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.

You can prevent remarketing by deleting your cookies or blocking cookies, though certain websites operate more effectively with cookies enabled.

We abide by the following principals with respect to remarketing:

- We will not use or associate personally identifiable information with remarketing lists, cookies, data feeds, or other anonymous identifiers;
- We will not use or associate targeting information, such as location, with any personally identifiable information collected from an ad or its landing page;
- We will not share any personally identifiable information with any partner ad network through our remarketing tag or any ad-associated product data feeds;
- We do not send precise location information without obtaining your consent.;
- We abide by Google’s policies for identified Sensitive Categories.; and
- 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.

ACCESS TO YOUR INFORMATION AND YOUR CHOICES

You can update, amend or delete information you provided at the time you registered at any time by contacting us at the address below or by logging into your account.

You can choose not to receive emails from us by either “unsubscribe” using the instructions in any email you receive from us or by emailing opt-out@yapstone.com. This will not stop us from sending emails about your account or your transactions with us.

You can choose to delete or block cookies by setting your browser to either reject all cookies or to allow cookies only from selected sites. If you block cookies performance of the Website may be impaired and certain features may not function at all.

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

YOUR RIGHTS RELATED TO OTHER WEBSITES

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.

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

MOBILE APPLICATIONS

When you download or use apps relating to our Websites, we may receive information about your location and your mobile device, including a unique identifier for your device. We may use this information to provide you with location-based services, such as advertising, search results, and other personalized content. Most mobile devices allow you to turn off location services. If you have questions about how to disable your device's location services, we recommend you contact your mobile service carrier or your device manufacturer.

PHISHING OR FALSE EMAILS

If you receive an unsolicited email that appears to be from us or one of our Partners or third parties that requests your personal information (such as your personal information, credit card number, YapStone login, or password), or that asks you to verify or confirm your account or other personal information by clicking on a link, that email was likely to have been sent by someone trying to unlawfully obtain your information. This is sometimes referred to as a "phishing" or "spoofing." We do not ask for this type of information in an email. Do not provide the information or click on the link. If you receive any suspected phishing or spoofing emails, please report it to privacyofficer@yapstone.com.

PROMOTIONS

Promotions, incentives, or giveaways may be made available through YapStone, our Partners, or third parties from time to time. You do not have to participate in these. However, if you choose to participate, you may be asked to disclose some personal information. Additionally, at the time of entering the promotion, we will disclose in its specific terms and conditions regarding how your personal information will be used. Please do not participate in any promotion if you do not agree to such usage.

CHANGES TO THIS PRIVACY POLICY

Any changes we may make to the Privacy Policy in the future will be posted on this page with an updated Effective Date and we will endeavour to notify

you by email, if one was provided to us, 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 to opt out of having us 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.

CONFLICT BETWEEN THIS PRIVACY POLICY AND THE TERMS OF SERVICE OR TERMS OF USE OF OUR SERVICES

Where there is a conflict between this Privacy Policy and an explicit provision of the Terms of Service or other Terms of Use related to our Services, this Privacy Policy will prevail over those other Terms.

CALIFORNIA PRIVACY RIGHTS

California law permits residents of California to request certain details about information we disclose to third parties for direct marketing purposes. If you are a California resident and would like to request this information, please contact us at the address listed below.

CONTACT US

Questions, comments, and requests regarding the Privacy Policy are welcomed and should be addressed to:

YapStone, Inc.
Legal Department
2121 N. California Blvd., Suite 400
Walnut Creek, CA 94596.
privacyofficer@yapstone.com

Effective Date: Last Updated: 06 of June 2017