



PRIVACY & SECURITY POLICY

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INTRODUCTION

QorPay Inc. (QorPay, we, us, or our) operates the website www.qorcommerce.io together with all related services and websites linking to this Privacy Policy (collectively, our Site), as well as interactions we may have with you offline or by email (collectively, the Services).

When we use the term personal information, we mean information that can be used to identify you.

References to you or your means the person accessing the Site or using our Services.

WHAT PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT

QorPay provides secure online and mobile digital payment processing services to businesses so that they can sell their products. The personal information QorPay collects depends on how you are using our Site and Services. We collect information about you directly from you and automatically through your use of our Site and Services.

Information We Collect Directly From You

Individuals typically interface with QorPay as one or more of the following: as a visitor to our Site, as a merchant customer, as a business partner and via other communication methods, as explained further below.

- **Site Visitor:** As a visitor to our Site, you may interact with us in a number of ways, such as completing our webforms to Request A Demo and contacting us if you have any questions about features, trials, pricing or want a demonstration of our products and services. If you interact with us via our Site, we will request that you provide us your name, company name, email address, phone number, title, and any additional information entered into the message box.
- **Merchants:** If you are one of our merchant clients, we may collect names, addresses, phone numbers, e-mail addresses, address, credit and debit card information, bank account numbers, credit information, electronic bank transfer information, or e-wallet credentials.
- **Merchant Customer:** If you are an end-user completing a transaction to purchase of goods and services from a merchant that has selected QorPay as its payments solution, your choice of payment method will usually determine what personal information is passed to us to enable your payment transaction to take place. It could be name, address, credit and debit card numbers, electronic bank transfer information, or e-wallet credentials.
- **Business Partners:** Business partners refer potential merchant clients to us. We integrate our platforms with business partners in order to assist in their clients (merchants) accessing data and information from the business partner or our platform. Business partners provide us contact information, including name, company name, address, email address, phone number, title and any additional information.
- **Potential Clients:** If you are not yet one of our merchant clients, we may collect names, addresses, phone numbers, email addresses, address, credit and debit card information, bank account numbers, credit information, electronic bank transfer information, or e-wallet credentials.
- **Other Interactions:** On our Site, we provide addresses for each of our offices, a phone number for you to reach us on the phone, and multiple email addresses. Depending on the form and substance of the interaction, you may

provide us personal information, including, but not limited to your name, phone number, email address, address, company name, and financial information.

Information We Collect Automatically From You; Cookies

Whenever you visit or interact with our Site, we, as well as our service providers, may use assorted technologies that automatically or passively collect information about how our Site is accessed and used. We refer to this information as traffic data. Traffic data may include browser type, device type used to access the Services (i.e., computer or mobile device), unique number assigned to identify such device, operating system, application version, click path taken through our Site, your use of features on our Site, and other usage information. We collect information about searches and the information you download or access. This information helps us manage, improve and customize our Site. Traffic data is generally non-identifying, but if we associate it with you as an identifiable person, we will treat it as personal information.

Technologies we use on our Site to collect traffic data, directly or through our service providers, may include cookies (data files placed on your computer or other devices used to access our Site), analytics software (e.g., Google Analytics) and pixel tags (transparent graphic image, sometimes called a web beacon or tracking beacon, placed on a web page or in an email, which indicates that a page or email has been viewed). Google Analytics is a web analytics service provided by Google, Inc. Google Analytics uses cookies to help the Site analyze how you use our Site. The information generated by the cookie about your use of our Site (including your IP address) will be transmitted to and stored by Google in aggregate form. Google uses this aggregated information on our behalf in order to evaluate use of our Site, compile reports on Site activity and other services relating to Site activity and usage. You can learn more about how Google Analytics and how to opt out here: <https://tools.google.com/dlpage/gaoptout>.

A cookie is a text file that is placed on your hard disk by a web page server. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the web server that you have returned to a specific page. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Site page, the information you previously provided can be retrieved, so you can easily use the features that you customized. Cookies further allow us to present to you the information that will most likely appeal to you based on your activity and preferences. You can refuse to accept the cookies we use by adjusting your browser settings. However, if you block all cookies, you may not be able to access certain features or functionality of our Site. You can find out more about how to manage cookies at www.allaboutcookies.org/manage-cookies.

Information We Receive From Other Sources

In addition to information we collect from you, we may receive your personal information from our service providers, such as companies that manage risk and fraud or market the Services, merchants, payment processors and banking partners, such as card networks and payment processors, credit bureaus, financial institutions, such as banks, and from third parties that you have permitted to release to us. We may receive information about you from publicly available sources, such as from social media platforms like LinkedIn.

HOW WE USE YOUR INFORMATION

In general, we use your personal information to accomplish our business and commercial purposes, including for marketing, transactional purposes, or to otherwise enhance our business practices and our services to you. More specifically, we may use your personal information:

- **To Process Transactions**
- **To Generate Transaction Documents**, including invoices, confirmation notices, delivery of services, tracking subscription accounts, prompt notifications, refunds and refund notices, warranty and dispute records, customer profiles, and tax payments.
- **To Communicate with You**, including to provide the information you have requested.
- **To Fulfill Contractual Obligations**
- **To Prevent and Detect Fraud**
- **For Our Business Purposes**, such as, product development, improving services, performing and assessing marketing activities, billing, invoices and account reconciliation functions.
- **To Comply with Legal Requirements and Industry Standards**, such as to comply with legislation, regulations, legal requirements and law enforcement measures, orders and subpoenas from judicial and governmental authorities, enforcement and defense of contractual and legal rights and claims, generation of reserves, guarantees and sureties.
- **To Improve Our Site and the Services**, such as to perform data analysis for Merchants, processing partners, regulators and customers; to audit; research and develop our Services using third-party services; to conduct business intelligence; and for performance reporting.
- **Conduct Credit Worthiness Checks**
- **To Adhere to Industry Standards**, such as card industry and payment scheme requirements, Payment Card Industry (PCI) assessment and validation.
- **To Tailor the Services to You**. We may use your information to provide you with content, data and advertisement tailored to your individual interests, enabling you to have a better experience when you access our Site and use our Services.
- **Application Considerations**. We may use your information to consider other applications you make to us.
- **Rights and Obligations Management**, such as to manage our rights and obligations in relation to external payment systems, e.g., credit card schemes and debit paymentschemes.
- **Market and Customer Research**, such as to conduct market or customer satisfaction research.
- **Facilitate Promotions**, such as developing, establishing and administering alliances and other arrangements (including rewards programs) with other organizations in relation to the promotion, administration and use of our respective products and services.
- **Administrative and Management Purposes**, including, without limitation, account management, data processing, data storage in support of our Site and the Services.

HOW WE SHARE INFORMATION

We may share your personal information and other information we collect with affiliates or business partners that require access to your personal information for business purposes. We may disclose your personal information to third parties to protect the security and integrity of the Services, to correct technical problems and malfunctions on the Services, to process payments, to conduct credit checks, for debt collection services, for

professional services such as accounting, legal counsel, and audits, to technically process your information, to provide the Services or to take precautions against liability. We also may provide your personal information to services provider who provide services on our behalf, such as our third-party website developer or analytics provider. with third-parties to serve or send advertisements on our behalf. Advertising companies will typically collect anonymous information about a users browsing activity, including the websites visited and the products viewed, and will then use that information to serve or send targeted advertisements. These targeted advertisements such as campaigns through Google AdWords including remarketing, interesting category marketing, similar audience campaigns, interest-based advertising, and demographic and location targeting. If you request services via a mobile device, your request will be transmitted via your mobile carriers network and your carrier may have access to it. Consult your carriers privacy policy for additional information. We may need to share relevant information with the specific merchant or business partner to fulfill our contractual obligations.

We reserve the right to transfer any information we have about you in connection with a sale, merger, consolidation, change in control, transfer of assets, reorganization or liquidation of our business. We reserve the right to disclose any personal information as needed if that information is requested by law enforcement agencies or if we are required to do so by law, treaty, regulation, subpoena, court order, or by a government entity. We also may disclose your personal information to third parties if we have reason to believe that disclosing such information is necessary to conduct investigations of possible breaches of law, to cooperate in any legal investigation, or to identify, contact, or bring legal action against someone who may be violating any agreement with us.

DO-NOT-TRACK REQUEST; THIRD PARTY TRACKING

Unless your browser settings are configured to make your online activities and information about your online activities (such as traffic data as described above) invisible to usage analytics tools, we do not presently have the capability to omit you from usage analytics to the extent your browser only sends us a do not track message and does not otherwise screen you from tracking without any action on our part. To learn more about browser tracking signals and Do Not Track, please visit <http://allaboutdnt.org>. Third parties, other than our vendors (such as our website analytics provider), do not have authorization from us to track which websites you visited prior to and after visiting our Site. Please note, however, that we cannot control third party tracking and there may be some third party tracking that occurs without our knowledge or consent.

SECURITY & DATA RETENTION

We use reasonable precautions, including technical, administrative, and physical procedures, to adhere to this Privacy Policy. Guaranteed security does not exist on the internet or offline due to the design of the Internet and other factors outside our control, and therefore we cannot guarantee that communications between you and our servers will be free from unauthorized access by third parties.

We will retain your personal information for as long as is necessary for purposes for which it was collected. The precise period will depend on the reason why it was collected. Those periods are also based on the requirements of applicable laws, applicable legal and regulatory requirements and periods relating to the commencement of legal actions.

YOUR CHOICES

Opt-Out: If you receive any promotional email communication from us, you will be given the option to unsubscribe from receiving further email communications from us at any time. Your option not to receive promotional and marketing material will not preclude us from corresponding with you, by email or otherwise, regarding your existing or past business relationships with us, and will not preclude us from accessing and viewing your personal information in the course of maintaining and improving the Services.

Cookies: You can set your browser to refuse all or some cookies or alert you when cookies are being sent. If you disable or refuse cookies or block the use of other technologies, some parts of the Services may then be inaccessible or not function properly.

THIRD-PARTY LINKS

The Services may contain links to third-party websites that are not controlled by us. These links are made available to you as a convenience, and you agree to use these links at your own risk. Please be aware that we are not responsible for the privacy practices or content of such third-party websites. This Privacy Policy only applies to information we collect from you while you are on the Services. If you navigate to a third-party website from the Services, we strongly encourage you to review and become familiar with that third-party websites own privacy policy and statements. Use of third-party social networking websites, such as Twitter and LinkedIn, are governed by the privacy policies and practices of those websites.

CHILDREN

Our Site and the Services may collect transaction information about children under the age of 18. This information includes name, address, debit and credit card numbers.

NOTICE TO RESIDENTS OF COUNTRIES OUTSIDE OF THE UNITED STATES

We are headquartered in the United States and currently our services are only intended for individuals located in the United States. If you are located outside of the United States, be advised that any information you provide to us will be transferred to and stored in the United States and that, by submitting information to us, you explicitly authorize its transfer and storage within the United States. We will protect the privacy and security of personal information according to this Privacy Policy regardless of where it is processed or stored.

CALIFORNIA PRIVACY RIGHTS

This information in this section only applies to California residents. You can contact us if you have any questions about this Privacy Policy, including this section specific to California residents, or if you would like a printed copy of this Privacy Policy. You may also print a copy of this Privacy Policy by selecting the Print button in your web browser.

How We Collect And Use Personal Information

This section describes the personal information (as defined by the California Consumer Privacy Act of 2018 or the CCPA) we collected about the California residents in the last 12 months, the sources of that information, our business or commercial purposes for collecting the information, and the third parties with whom we shared that information. Please refer to the corresponding sections of this Privacy Policy for details on the following:

WHAT PERSONAL INFORMATION WE COLLECT AND HOW WE COLLECT IT: This section describes the categories of personal information we collected and the categories of sources from which the information was collected.

HOW WE USE YOUR INFORMATION: This section describes the business or commercial purposes for which we collected the information.

HOW WE SHARE INFORMATION: This section lists the categories of third parties with whom we shared personal information.

Your Rights And How To Exercise Them

California residents have certain rights under the CCPA. Those rights may only apply in certain circumstances and may be subject to limitations or exceptions. A summary of those rights is provided below as well as information on how to exercise your rights. Please note that we will require certain identifying information about you as necessary for us to verify your request in accordance with applicable law.

Right to Know. You have the right to know what personal information we collect, use, disclose and/or sell about you.

Right to Delete. You have the right to request us to delete the personal information we collect or maintain about you. Please note that certain exceptions may apply to your right to delete information, such as when we must retain your information to comply with law. We will notify you if any such exceptions apply to your request.

Right to Non-Discrimination. You have the right not to receive discriminatory treatment by us for exercising any of your rights under the CCPA. However, we may offer certain financial incentives, charge reasonable fees related to your requests, or deny your right to know, right to opt out of sale or right to deletion in accordance with applicable law.

To submit a request to exercise any of the rights described above, you may contact QorPay via one of the methods listed in Contact Us section below. If you are a Merchant Customer, please direct your requests directly to the merchant with whom you made the transaction.

You can exercise these rights yourself or you can designate an authorized agent to make a request on your behalf. Your authorized agent must be able to demonstrate authority to act on your behalf as further instructed when submitting a verifiable request on your behalf.

Disclosure Of Personal Information

We disclosed personal information to third parties for business or commercial purposes during the last 12 months as further described in the HOW WE SHARE YOUR INFORMATION section above. We do not and will not sell your personal information.

We do not knowingly collect the personal information of minors under age 16 and do not sell such information.

SECURITY

If you have any questions about this Privacy Policy, you can contact us by sending an email to support@qorpay.com. When you place orders on our websites or through our mobile applications, all of your order information, including your credit card number and delivery address, is transmitted through the Internet using Secure Sockets Layer (SSL) technology. SSL technology causes your browser to encrypt your order information before transmitting it to our secure server. SSL technology, an industry standard, is designed to prevent someone other than operators of our websites from capturing and viewing your personal information.

While we use industry standard means to protect our websites and your information, the Internet is not 100% secure. The measures we use are appropriate for the type of information we collect. We cannot promise that your use of our websites or mobile applications will be completely safe. We encourage you to use caution when using the Internet. Online access to your personal information is protected with a password you select. We strongly recommend that you do not share your password and that you use unique passwords for all of your online account.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. We will notify you of such changes by posting the updated Privacy Policy on our Site. When we post changes to this Privacy Policy, we will revise the last updated date found at the top of this Privacy Policy. Such changes to the Privacy Policy shall become effective upon posting. We recommend that you check this Privacy Policy periodically, to inform yourself of any changes to it. Your continued use of the Services after any changes or revisions to this Privacy Policy will indicate your agreement with the terms of such revised Privacy Policy.

CONTACT US

If you have any questions about this Privacy Policy, you can contact us by sending an email to support@qorpay.com.