

**PAYLIVE©**  
**PRIVACY POLICY**  
(V-5.0.0 24may18)  
p. 1/6

PayLive Software and Mobile applications (“Applications”) and the PayLive Software website (“Website”) are created and developed by PayLive Inc. (“PayLive” or “We”, “Us”, “Our”), 6020 NW 99<sup>th</sup>. Ave., Unit 107, Doral , FL 33178, USA. This privacy policy explains how PayLive uses personal data from and about you, on the portal or mobile sites operated by PayLive, by phone, email, or otherwise when you visit our website, or use any PayLive application or any of the services provided on and through our website or applications, including providing or purchasing services.

PayLive is committed to protecting your personal data and being transparent about what information it holds. PayLive understands its obligations to help you understand how and why PayLive processes your personal data. This policy tells you about the why, what, how, and when in relation to PayLive collection and processing of your personal data.

### **What is Personal Data?**

According to the European Union’s General Data Protection Regulation definition (Chapter 1, Article 4), personal data is:

...any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

### **Your Privacy Rights**

This Privacy Policy describes your privacy rights regarding the collection, use, storage, sharing and protection of your personal information by PAYLIVE. It applies to the PAYLIVE.com website and all related sites, mobile and other applications, services and tools, regardless of how you access or use them. You accept this Privacy Policy when you sign up for access or use our products, services, content, features, technologies or functions offered on our website and all related sites, applications, and services (collectively “PayLive® Services”).

We may amend this policy at any time by posting a revised version of it on our website. The revised version will be effective at the time we post it. In addition, if the revised version includes a substantial change, we will provide you with 30 days’ prior notice by posting notice of the change on the "Policy Updates" page of our website.

## **1. How we collect information about you**

When you visit the PayLive® website or use PayLive® Services, PAYLIVE collects information sent to us by your computer, mobile phone or other access device. The information sent to us includes data on the pages you access, your computer IP address, device identifiers, the type of operating system you’re using, your location, mobile network information, standard web log data and other information. Web log data includes the browser type you’re using and traffic to and from our site. When you visit the PAYLIVE.com website or PayLive applications or use PayLive® Services, we also collect information about your transactions and your activities.

In addition, if you open a PayLive® Wallet(-Account) or use PayLive® Services, we may collect the following types of information, amongst others:

- Contact information, such as your name, address, phone, email, and other similar information.
- Financial information, such as the Wallet(-Account) numbers and/or PayPal Account number and information associated with it.
- Detailed personal information such as your date of birth or social security number.

We may also obtain information about you from third parties such as PayPal, credit bureaus and identity verification services.

**PAYLIVE®**  
**PRIVACY POLICY**  
(V-5.0.0 24may18)  
p. 2/6

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (e.g. Facebook and/or Twitter). The information we may receive varies by site and is controlled by that site. By associating a Wallet(-Account) managed by a third party with your PayLive® Wallet(-Account) and authorizing PayLive® to have access to this information, you agree that PayLive® may collect, store and use this information in accordance with this Privacy Policy.

In order to help protect you from fraud and misuse of your personal information, we may collect information about your use and interaction with our website or applications or PayLive® Services. For example, we may evaluate your computer, mobile phone or other access device to identify any malicious software or activity. We may also collect additional information from or about you in other ways, such as through contact with our customer support team, results when you respond to a survey and from interactions with members of other companies.

We take your privacy very seriously and will never disclose, share or sell your data without your consent, unless required to do so by law. We only retain your Personal Data for as long as is necessary and for the purposes specified in this policy. All the information is collected in accordance with this privacy policy and in compliance with the applicable data protection laws. Your information is used to give you all PayLive services, develop, deliver, protect, and improve products, services, content, and customer communications.

Personal Data is collected and stored only if you register to PayLive and use the software, website or mobile apps. Depending on the action you take, we store the name and email address that you provide us with, your Internet Protocol (IP) address, and the data you provide to us when registering. We never get access to, process or store your payment details (credit card number, PayPal account details, etc.); we do store the PayPal email and the movements of Time Tokens.

We may also use the stored personal data to reply to your customer support requests, to send you information on product updates, or to communicate with you concerning other important Applications related issues.

We may occasionally send you marketing information when we have assessed that it is beneficial to you as a client and it is in our interests. You are free to withdraw this consent at any time. There is an easy to find Opt-Out link in the emails you may receive from us.

## **2. How we use Cookies**

When you access our website or use PayLive® Services, we (including companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, or other local storage files provided by your browser or associated applications ("Cookies"). We use these technologies to: recognize you as a customer; customize PayLive® Services, content, and advertising; measure promotional effectiveness; help ensure that your Wallet(-Account) security is not compromised; mitigate risk and prevent fraud; and to promote trust and safety across our sites and PayLive® Services.

We may use both session and persistent Cookies. Session Cookies expire and no longer have any effect when you log out of your Wallet(-Account) or close your browser. Persistent Cookies remain on your device until you erase them or they expire.

We encode our Cookies so that we can interpret the information stored in them. You are free to decline our Cookies if your browser or browser add-on permits, but doing so may interfere with your use of our website and PayLive® Services. Refer to the help section of your browser, browser extensions, or installed applications for instructions on blocking, deleting, or disabling Cookies.

You may encounter PayLive® Cookies on websites that we do not control. For example, if you view a web page created by a third party or use an application developed by a third party, there may be a Cookie placed by the web page or application. Likewise, these third parties may place their own Cookies that are not subject to our control and the PayLive® Privacy Policy does not cover their use.

### **3. How we protect and store personal information**

Throughout this policy, we use the term "personal information" to describe information that can be associated with a specific person and can be used to identify that person. We do not consider personal information to include information that has been made anonymous so that it does not identify a specific user.

We store and process your personal information on our computers in the US and elsewhere in the world where our facilities are located. We protect your information using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. Some of the safeguards we use are firewalls and data encryption, physical access controls to our data centers, and information access authorization controls.

### **4. How we use the personal information we collect**

Our primary purpose in collecting personal information is to provide you with a secure, smooth, efficient, and customized experience. We may use your personal information to:

- Provide PayLive® Services and customer support;
- Process transactions and send notices about your transactions;
- Resolve disputes, collect fees, and troubleshoot problems;
- Prevent potentially prohibited or illegal activities, and enforce our User Agreement;
- Customize, measure, and improve PayLive® Services and the content, layout, and operation of our websites and applications;
- Deliver targeted marketing, service update notices, and promotional offers based on your communication preferences;
- Contact you at any telephone number, by placing a voice call or through text (SMS) or email messaging, as authorized by you in our User Agreement.
- Compare information for accuracy and verify it with third parties.

### **5. Other Websites and Links**

Our site may contain links that belong to third parties. Any third party website featured on our site has its own privacy policy. You should check their terms. These third party websites are outside our control and are not covered by this Privacy Policy. We do not accept liability or responsibility for the activities, privacy policies or levels of compliance of these third parties.

### **6. Age Limitations**

We do not knowingly collect personal information from children under 16. If we learn that we have collected personal information from a child under 16, we will promptly delete this information. Parents or guardians can contact us at [feedback@paylive.com](mailto:feedback@paylive.com).

### **7. Marketing**

We do not sell or rent your personal information to third parties for their marketing purposes without your explicit consent. We may combine your information with information we collect from other companies and use it to improve and personalize PAYLIVE © Services, content, and advertising. If you do not wish to receive marketing communications from us or participate in our ad-customization programs, simply indicate your preference by logging into your Wallet(-Account) and going to the Notification section under the Settings tab and updating your preferences, or by following the directions that may be provided within the communication or advertisement.

We respect your communication preferences. If you no longer wish to receive notifications via our application, you can adjust your preferences by visiting the settings page of the application.

We may call or text message (SMS) you at a mobile phone number that you may have provided to us. You can indicate your contact preferences by logging into your Wallet(-Account) and adjusting your preferences in your Wallet(-Account) Information Settings or by following the directions provided within the communication.

## **8. How we share personal information with other PAYLIVE® users**

To process your Time-Value DATA exchange, we may share some of your personal information with the person or company that you are paying or that is paying you. Your contact information, date of sign-up, the number of Time-Value DATA exchange you have received from verified PayLive® users, and whether you have verified control of a Wallet(-Account) are provided to other PayLive® users with whom you transact through PayLive®. In addition, this and other information may also be shared with third parties when you use these third parties to access PayLive® Services. Unless you have agreed to it, these third parties are not allowed to use this information for any purpose other than to enable PayLive® Services.

If someone is sending you Time-Tokens (₯) and enters your email address, we will provide them your registered name and Wallet(-Account) number so they can verify they are sending the Time-Tokens (₯) to the correct Wallet(-Account).

If you are buying contents or services by transferring electronic data through PayLive®, we may also provide the seller with your shipping and billing address to help complete your transaction. The seller is not allowed to use this information to market their services to you unless you have agreed to it. If an attempt to transfer electronic data to your seller fails, or is later invalidated, we may also provide your seller with details of the unsuccessful data transfer.

We work with third parties, including sellers, to enable them to accept or exchange Time-Value DATA from or to you using PayLive®. In doing so, a third party may share information about you with us, such as your email address or mobile phone number, to inform you that an electronic data transfer has been sent to you or when you attempt to transfer electronic data to a merchant or third party. We use this information to confirm that you are a PayLive® customer and that PayLive® as a form of electronic data transfer can be enabled, or to send you notification of a transfer status. Also, if you request that we validate your status as a PayLive® customer with a third party, we will do so.

Please note that sellers and users you buy from or contract with have their own privacy policies, and although the PayLive®'s User Agreement does not allow the other transacting party to use this information for anything other than providing PayLive® Services, PayLive® is not responsible for their actions, including their information protection practices.

Regardless, we will not disclose any other personal or financial information to anyone you have paid or who has paid you using PayLive®, or with the third parties that offer or use PayLive® Services, except with your express permission or if we are required to do so to comply with a subpoena or other legal process.

## **9. How we share personal information with other parties**

We may share your personal information with:

- Service providers under contract who help with our business operations such as fraud prevention, bill collection, marketing and technology services. Our contracts dictate that these service providers only use your information in connection with the services they perform for us and not for their own benefit.
- Credit bureaus and collection agencies to report Wallet(-Account) information, as permitted by law.
- Companies that we plan to merge with or be acquired by (should such a combination occur, we would require that the new combined entity follow this privacy policy with respect to your personal information. If your personal information could be used contrary to this policy, you will receive prior notice in order to be able to react.)
- Law enforcement, government officials, or other third parties pursuant to a subpoena, court order, or other legal process or requirement applicable to PayLive® or one of its affiliates; when we need to do so to comply with law; or when we believe, in our sole discretion, that the disclosure of personal information is necessary to prevent physical harm or financial loss, to report suspected illegal activity or to investigate violations of our User Agreement.
- Other third parties with your consent or direction to do so.
- PayLive® will not sell or rent any of your personal information to third parties for their marketing purposes and only shares your personal information with third parties as described in this policy.

- If you open a PayLive® Wallet(-Account) directly on a third party website or via a third party application, any information that you enter on that website or application (and not directly on the PayLive® website) will be shared with the owner of the third party website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with personal information. PayLive® is not responsible for the content or information practices of such third parties.

## **10. How you can restrict PayLive® from sharing your personal information**

PayLive® maintains your preferences for use and sharing of information, including how we contact you. Some international, federal and state laws allow you to restrict the sharing of your personal information in certain instances. PayLive® does not share your personal information with third parties for their marketing purposes unless you have given your explicit consent. PayLive®'s related family of companies will only use your personal information for marketing purposes if you have requested services from those companies. If you do not want PayLive® to share your personal information with other associated companies for the purpose of marketing their products within our corporate family, simply indicate your preference by logging into your Wallet(-Account), going to the Notification section under the Settings tab and updating your preferences.

## **11. How you can access or change your personal information**

You can review and edit your personal information at any time by logging in to your Wallet(-Account) and reviewing your Wallet(-Account) settings and profile. You can also close your Wallet(-Account) through the PayLive® website. If you close your PayLive® Wallet(-Account), we will mark your Wallet(-Account) in our database as "Closed," but may retain personal information from your Wallet(-Account) to collect any fees owed, resolve disputes, troubleshoot problems, assist with any investigations, prevent fraud, enforce our User Agreement, or take other actions as required or permitted by law.

## **12. Your Rights**

You have the right to access any Personal Data that we process about you and request information about:

- What personal data we hold about you;
- Purposes of the processing;
- The categories of personal data concerned;
- The recipients to whom the personal data has been/will be disclosed;
- How long we intend to store your personal data for;
- If we did not collect the data directly from you, information about the source;
- If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information, and we will strive to do so as quickly as possible, unless there is a valid reason for not doing so, at which point you will be notified.
- You also have the right to be forgotten of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us.

Accordingly, you have the right to request access to your data or to instruct us to remove data permanently from our systems by contacting us at [feedback@paylive.com](mailto:feedback@paylive.com).

Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use. If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request — this is to ensure that your data is protected and kept secure.

## **13. GDPR Compliance**

As a controller of PayLive's personal data, we recognize our responsibility to respect privacy rights and put in place appropriate standards of data protection.

The General Data Protection Regulation (GDPR) is a new European privacy regulation which will replace the current EU Data Protection Directive (Directive 95/46/EC). The GDPR aims to strengthen the security and protection of personal data in the EU and harmonize EU data protection law. One of the key aspects is that GDPR creates consistency across EU member states on how personal data can be processed, used, and exchanged securely.

We comply with the GDPR on a continual basis (because we may hold and process personal data of EU residents) by implementing and regularly reviewing robust technical and organizational measures, as well as compliance policies.

We use third party services to process personal data that we may collect. And to comply with the GDPR requirements, we have Data Processing Agreements (DPA) in place with all such third party services we may use.

#### **14. Confidentiality and Security**

All communications between your web browser and our Website, as well as between Applications and our servers, are secured by strong SSL encryption. The access to Personal Data is restricted to employees directly involved in customer support or analytics who are trained to observe strict standards of confidentiality and respect.

#### **15. How you can contact us about privacy questions**

If you have questions or concerns regarding this policy, you should contact us using the Contact Us link available at our website, or writing to us at: PayLive Inc., Attn: Privacy Department, 6020 NW 99TH AVE, UNIT 107, DORAL , FL 33178.

----- END -----