

**Our Privacy Policy in a nutshell.**

We take your privacy seriously. We do not sell your information to third parties for marketing purposes. In the event we share your information with third parties, we take all reasonable precautions to ensure they do not abuse your data or sell it for marketing purposes.

**This Privacy Policy is effective as of February 27, 2016.**

Synapse Payments, LLC (“SynapsePay”) is committed to protecting your privacy and earning your trust. This Privacy Policy discloses our privacy practices for personal information we collect when you use or access our products, services, features, or content through any website, application, or service (“SynapsePay Services”), even if you have not opened a SynapsePay account or visited our website [synapsepay.com](http://synapsepay.com), or our mobile application (“SynapsePay Sites”). We may, in our sole discretion, change this Privacy Policy from time to time by posting a revised version at [synapsepay.com/privacy](http://synapsepay.com/privacy). If we make any material change, we will notify you by email (as listed in your account profile) or by means of a notice on [synapsepay.com/privacy](http://synapsepay.com/privacy) prior to the change becoming effective. If you have questions or complaints regarding our Privacy Policy or practices, please contact us at: [hello@synapsepay.com](mailto:hello@synapsepay.com).

## **1. What information does SynapsePay collect?**

If you use or access SynapsePay Services, or open a SynapsePay account, we may collect the following personal information:

- Contact and identification information, such as your name, phone, email, tax identification number, organizational documents (if you are a business) and other similar information, such as identification questions and answers.
- Financial information, including, but not limited to (i) your bank account and routing numbers, (ii) bank login credentials and security questions; and/or (iii) other information relating to your bank account (balance, transaction history) if you choose to use it with SynapsePay Services.
- Your photo or “avatar” that you choose to add to your profile. Other users of SynapsePay Services may be able to view your photo. You may change your photo at any time in your account settings.
- Information that you provide to SynapsePay or our merchants when interacting with customer support team or other team members via phone, email, online form, or other correspondence.
- Personal information stored with third parties that you choose to provide to Synapse or made available to the public, such as social media account information and your social media contacts. By linking your third party accounts or using third party sign-in services, you authorize SynapsePay to have access to this information and you agree that SynapsePay may collect and use this information in accordance with this Privacy Policy.
- Personal testimonial information or endorsements that you voluntarily provide to us and which we may display with your name on SynapsePay Sites with your consent. To update or delete your testimonial, contact us at [hello@synapsepay.com](mailto:hello@synapsepay.com).

We also collect the following information (“Web Browser Information”) from your device when you use SynapsePay Services: your IP address, web-based device fingerprint, the type of device you use, your device identifier, your operating system version, the type of browser you use, your location, and the URL that you came from and the next URL that you visit.

## **2. How does SynapsePay use the personal information that it collects?**

We collect your personal information to:

- Provide SynapsePay Services to you and the users and merchants you transact with using our Services.
- Notify you about your account activity.
- Process transactions and collect fees.
- Provide customer support and resolve disputes.
- Verify your identity and account information.
- Identify, prevent, and report potentially prohibited, fraudulent or illegal activities.
- Provide transaction, risk mitigation and “know your customer” reports to our Financial Institution Partner(s) and/or merchants.
- Customize and improve your SynapsePay experience and SynapsePay Services.
- Contact you at your telephone number by voice or SMS to validate the telephone number or your SynapsePay account.
- Notify you about important changes to SynapsePay Services and/or Synapse’s terms and conditions.
- Provide you with news, offers and information about SynapsePay Services based on your communications preferences.
- Any other purpose that we disclose to you in the course of providing SynapsePay Services to you.

## **3. How does SynapsePay share my personal information?**

We may share your personal information as follows:

- When you send or receive money using SynapsePay Services, we will provide the other SynapsePay user with your registered name, transaction count, transaction total and your avatar photo.
- If your payment to another SynapsePay user fails, we may provide that user with details of the unsuccessful payment.
- With third parties to provide, maintain and improve SynapsePay Services, including fraud prevention, identity verification, analytics services, and financial institutions and other partners that are part of the payment process.
- With third parties to mitigate risk of Users and their transactions.

- With third parties upon your request if for example, you ask SynapsePay to confirm your status as a SynapsePay user with a third party merchant (receiver or sender).
- With third parties and the public in a pseudo anonymous fashion, to provide a public ledger of System (as defined in the TOS) and transaction history between nodes to promote security and validity of the ledger and the System.
- If we believe disclosure is reasonably necessary (i) to comply with any applicable law, legal process or government request; (ii) to investigate or bring legal action against someone who may be violating our rights, our terms and conditions, or the rights of others; or (iii) to protect the safety and security of SynapsePay, our users, or the public.
- With a third party if we are involved in a merger, acquisition, or sale of all or a portion of our stock or assets. If this occurs, you will be notified of any change to this Privacy Policy, as well as any choices you may have regarding your personal information.
- We may share aggregated, non-personally identifiable information with third parties.

Other than as stated in this Privacy Policy, SynapsePay does not disclose or sell any of your personal information to third parties without your consent. Please note that third parties, such as merchants that you pay and third party websites that you visit, have their own privacy policies. SynapsePay is not responsible for the policies and practices of such third parties.

#### **4. How does SynapsePay use cookies and web beacons?**

Cookies, fingerprints and web beacons are technologies that SynapsePay and our third party service providers use to collect Web Browser Information in order to track how SynapsePay Sites and SynapsePay Services are used. Cookies are small data files that are stored on your computer's hard drive and web beacons are tiny graphics embedded on webpages. Fingerprints are a unique device identifier. These technologies allow us to: provide you with a personalized experience by recognizing you when you return to SynapsePay Sites; better understand our users by tracking how they use SynapsePay Services; improve the design and content of SynapsePay Sites by tracking how users interact with SynapsePay Sites; and identify and prevent fraudulent activity. We may link

Web Browser Information to any personal information that you submit while on SynapsePay Sites. Our third party service providers may use cookies and web beacons to provide analytics services to Synapse, or to serve you advertisements in connection with SynapsePay Services. You can change your browser settings to refuse cookies, but this may interfere with your use of SynapsePay Sites. Third parties, with whom we partner to provide some content such as video clips, use Flash cookies which cannot be removed using your browser settings. To learn how to manage your Flash cookie preferences, visit the Flash Player Settings Manager Help page [here](#). This Privacy Policy does not apply to third party cookies, web beacons, social media features and widgets (such as the Facebook Like button), or other tracking technologies used by third parties. SynapsePay is not responsible for the privacy policies and practices of such third parties.

#### **5. What security precautions does SynapsePay take to protect me?**

We have security measures in place to protect your personal information, including the use of industry-standard data encryption technology and internal policies and restrictions regarding the storage of and access to your personal information. Please note that while we uphold ourselves to high security measures, no data transmission over the Internet or method of electronic storage can be guaranteed to be 100% secure. SynapsePay's servers and business operations are entirely located in the United States.

#### **6. Consent**

By using our service, visiting our site or using our applications you are consenting to the terms of this Privacy Policy.

#### **7. How do I update my information?**

If your personal information changes, you can update or correct it in your account settings by logging into your account on the apps. We will retain your information for as long as your account is active or as needed to provide you SynapsePay Services. If you wish to close your account or request that we no longer use your information to provide you SynapsePay Services, contact us at [hello@synapsepay.com](mailto:hello@synapsepay.com). We will retain and use

your information as necessary to comply with our legal obligations, resolve disputes and enforce our terms and conditions.

#### **8. What about the privacy of children?**

SynapsePay is a general audience website. SynapsePay does not knowingly collect any personal information from anyone under the age of 13.

#### **9. Public Forums**

SynapsePay sites may offer publicly accessible blogs or community forums, which may require creation of an account with a third party. Any information you provide in these areas may be visible to the public, so we recommend that you avoid disclosing personal information. To request removal of your personal information from these areas, contact us at [hello@synapsepay.com](mailto:hello@synapsepay.com). In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why.

#### **10. Contacting us**

If you have any questions regarding SynapsePay Privacy Policy, please contact us at [hello@synapsepay.com](mailto:hello@synapsepay.com).