

PRIVACY NOTICE

EFFECTIVE DATE: MARCH, 31ST 2016

MasterCard International Inc. respects your privacy. This Privacy Notice applies to the Simplify Commerce Service (the “Service”) available at www.simplify.com (the “Site”).

It describes the types of personal data we collect in connection with the Service, the purposes for which we collect such personal data, the other parties with whom we may share it, the measures we take to protect the security of the data and our direct marketing practices. It also tells you about your rights with respect to your personal data, how you can reach us to update your information or get answers to questions you may have about our privacy practices.

1. Marketing Communications

If you opt-in to receiving communications about MasterCard products or services or Simplify Commerce, we may send you communications that we believe may be useful to you in your business. You can at any time tell us not to send you marketing communications by e mail by clicking on the unsubscribe link within the marketing e-mails you receive from us or by changing your settings on your preferences page on your account. We will apply your preferences going forward.

2. Personal Data We Collect

In connection with the Service, we collect certain personal data from merchants participating in the Service (“Merchants”) and their respective service providers, developers and/or admins when an account is being created on behalf of a Merchant as part of the enrollment process to the Service. Such personal data includes, but is not limited to, business type, legal name, tax id, business start date, filing state, business address, owner name, owner date of birth, owner phone number, owner mobile phone number, owner social security number, owner address, customer service phone number, bank name, bank routing number, bank account number, username, and password..

If you create a developer account in connection with the Service, we collect personal data from you in order to operate your account. Such personal data includes, but is not limited to, First Name, Last Name, Email (doubles as Username), and Password.

We may also process the personal data of individuals who make payments through the Service on behalf of Merchants. There are obligations that apply to Merchants with respect to personal data about individuals making payments to Merchants through the Service, which are described in the [Merchant Terms of Use](#) (“Merchant TOU”). Please make sure to read the Merchant TOU carefully to make sure you understand how these obligations may apply to you and that you can comply.

3. Information We Collect Automatically

We also may collect certain information by automated means such as cookies and web beacons, for example to remember you. A cookie is a text file containing small amounts of information which is downloaded on your device’s memory and can

subsequently be accessed by our web servers. A web beacon is an object embedded in and downloaded together with a webpage which accordingly provides information as to the viewing of that webpage. This paragraph provides you with information about these technologies and their purpose.

Strictly necessary or essential cookies

Strictly necessary and/or essential cookies enable you to use the Service and to securely access the Site and its functionalities.

The following information is placed in/collected through these cookies: session ID (to remember your credentials in the course of your session); and server affinity and authentication data (to establish and maintain communication with the most appropriate servers). Session cookies are deleted when you log out of the Site.

You may reject these strictly necessary cookies by altering the cookie function of your browser. The “help” portion of the toolbar on most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. However, if you reject these cookies, you will not be able to use the Service, as these cookies are strictly necessary for the Service to operate.

Persistent Cookies and Web Beacons

Third-party persistent cookies are used for web analytics purposes for MasterCard's exclusive use, i.e., for managing and improving the performance and design of the Service. These are provided by Omniture and Google Analytics. The following information is placed in/collected through the third party cookies and web beacons: unique identification number assigned to your device; IP address; browser type; operating system; referring URLs; information on actions taken; dates and times of Site visits. All data collected by via these third party cookies and web beacons on behalf of MasterCard is aggregated and of a statistical nature.

4. How Do We Use Personal Data We Collect

We may use the personal data we obtain about you to:

- Create and manage your online account, provide the Service to you, and respond to your inquiries;
- Validate your payment card information;
- Provide, administer and communicate with you about products, services and promotions including the display of customized content and advertising;
- Protect against and prevent fraud, unauthorized transactions, claims and other liabilities, and manage risk exposure and franchise quality;
- Operate, evaluate and improve our business (including by developing new products and services; managing our communications; determining the effectiveness of our advertising; analyzing our products, services and websites;

facilitating the functionality of our websites; and performing accounting, auditing, billing, reconciliation and collection activities);

- Assist third parties in the provision of products or services that you request from third parties;
- Monitor the use of and improve our interactive assets, including the Simplify Commerce website;
- Perform data analyses (including anonymization of personal information) in furtherance of the foregoing;
- Enforce our Simplify Commerce Merchant Terms of Use;
- Comply with applicable legal requirements and industry standards and our policies; and
- Perform auditing, research and analysis in order to maintain, protect and improve our service.

5. Your Rights and Choices

You have certain rights regarding the personal data we maintain about you. We offer you choices about what personal data we collect from you, how we use that data, and how we communicate with you.

You may refrain from submitting information to us. However, if you do not provide personal data when requested, you will not be able to register with the Service and we may not be able to provide you with information about the Simplify Commerce products and services.

You have the right to request access to and receive information about the personal data we maintain about you, update and correct inaccuracies in your personal data, as appropriate. The right to access personal data may be limited in some circumstances by local law requirements. To learn more, please contact us as set forth below.

6. Personal Data We Share

We do not sell or otherwise disclose personal data we collect about you, except as described herein or otherwise disclosed to you at the time the data is collected.

We share personal data to perform the services requested through the Service. When you create an account with MasterCard, either for yourself or on behalf of a Merchant, we share your personal data with the independent third party acquirer you have chosen in connection with the Service (referred to herein as "Processor"), to allow them to review and evaluate your account application, to create an account for you, to

process payment transactions performed on such Merchant's customers and to provide the Service. Since Processor will be responsible for the processing of your personal information for the above mentioned purposes you should become familiar with its privacy and data protection practices as detailed in their privacy notice available [here](#). MasterCard does not control and assumes no liability for the data protection practices of Processor.

We may also share personal data with our affiliates, entities that assist with payment card fraud prevention, and merchants. We may share aggregated and de-identified information with participating financial institutions and their customers. For example, we may share data to show trends about the general use of the Service.

We also may share data with our service providers who perform services on our behalf. We do not authorize these service providers to use or disclose such data except as necessary to perform certain services on our behalf or comply with legal requirements. We require these service providers by contract to appropriately safeguard the privacy and security of personal data they process on our behalf.

We also may disclose personal data about you (i) if we are required to do so by law or legal process, (ii) if we are requested by law enforcement authorities or other government officials, or (iii) when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss, or in connection with an investigation of suspected or actual fraudulent or illegal activity. We also reserve the right to transfer personal data we hold about you in the event we sell or transfer all or a portion of our business or assets. We may also disclose your personal data to potential acquirers in the event of a prospective sale or transfer. Following such a sale or transfer, you may contact the entity to which we transferred your personal data with any inquiries concerning the processing of that information.

7. How We Protect Personal Data

We restrict access to personal data about you to those employees who need to know that information to provide products or services to you. We maintain appropriate administrative, technical and physical safeguards to protect personal to protect the personal data we have about you against accidental or unlawful destruction, accidental loss, unauthorized alteration, unauthorized disclosure or access, misuse, and any other unlawful form of processing. We also take measures to destroy or permanently de-identify personal information when there is no longer a business need to keep the information. The types of measures we take vary with the type of information, and how it is collected and stored.

8. Data Transfers

We may transfer personal information to countries other than the country in which the data was originally collected. These countries may not have the same data protection laws as the country in which you initially provided the information. When we transfer your personal information to other countries, we will protect that information as described in this Privacy Notice.

MasterCard is a global business. To offer our services, we may need to transfer

your personal information among several countries, including the United States, where we are headquartered. We endeavor to comply with applicable legal requirements providing adequate safeguards for the transfer of personal information to countries outside of the United States.

9. Links to Other Websites

The Service may contain links to Internet sites maintained by third parties. Any personal data collected on the resulting site will not be controlled by MasterCard or its service providers but will be subject to the privacy notice and terms of use of the resulting site. We strongly suggest that you review the Privacy Notice and terms of use of the resulting site.

10. Updates to Our Privacy Notice

This Privacy Notice may be updated periodically and without prior notice to you to reflect changes in our personal information practices. We will post a prominent notice on our websites to notify you of any significant changes to our Privacy Notice and indicate at the top of the notice when it was most recently updated. Please check this Privacy Notice and the Simplify Commerce website periodically to ensure that you are aware of any changes or updates.

11. How to Contact Us

To update your preferences, ask us to remove your data from our mailing lists or submit an access request for information collected through this Site or the Service, please contact us as specified below. If you are a Merchant, to exercise your data protection rights in relation to the operation of the Service performed by Processor and the relevant payment transactions, please email Simplify Customer Support at support@simplify.com and we will pass your email on to Processor.

If you have any questions or comments about this Privacy Notice or if you would like us to update the data we have about you or your preferences, please [click here](#). You may also contact us by writing to:

Global Privacy & Data Usage Officer
MasterCard Worldwide
2000 Purchase Street
Purchase, New York 10577
USA