

## Privacy Policy for Users Who Apply or Sign Up for a AdWallet Account

*Last Updated October 1, 2019*

AdWallet respects your privacy and is committed to protecting it through this Privacy Policy.

This Privacy Policy governs your access to and use of [adwallet.com](http://adwallet.com) or **AdWallet apps**, referred to as **AdWallet, Website or Websites (collectively “Website”** including any content, functionality and services offered on or through **adwallet.com** whether as a guest or a registered user.

When accessing [adwallet.com](http://adwallet.com) or the AdWallet apps, AdWallet will learn certain information about you, both automatically and through voluntary actions you may take, during your visit. This policy applies to information we collect on the Website, in App and in email, text, or other electronic messages between you and AdWallet.

We are providing you with this privacy policy to explain to you how we use any personal information we collect about you when you use our Website. This Privacy Policy is intended to provide you with information as to: (i) the type of information collected, (ii) how collected information is used and with whom it is shared; (iii) how we intend to protect the information; and (iv) how you can access, modify and/or delete such information.

Please read the Privacy Policy carefully before you start to use AdWallet. **By using your AdWallet account or by clicking to accept or agree to the Terms of Use when this option is made available to you, you accept and agree to be bound and abide by the Privacy Policy.** If you do not want to agree to the Privacy Policy, you must not access or use AdWallet.

### Use and Sharing of Personal Consumer Information

Except as otherwise provided in this policy, we attempt to ensure that we never intentionally disclose any personal consumer information about you as an individual user to any third party without having received your permission (through opting in or similar procedures) except as provided for in this policy or otherwise as permitted or required under law.

We have the following exceptions to this policy: We will release specific information about you or your account to comply with any valid governmental inquiry or legal inquiry or process such as a search warrant, subpoena, statute or court order from courts of competent jurisdiction. We will also release specific information in special cases, such as if there is an attempted breach of the security of the Websites or a physical or property threat to you or others. We may also transfer user information, including personal consumer information, in connection with a corporate merger, consolidation, the sale of related assets or corporate division or other fundamental corporate change. We may provide access to your personal consumer information to our contractors, vendors and third-party applications that are performing services for us in connection with our Websites or the services or products we offer.

In addition, on occasion, we may collect personal consumer information from you in connection with optional contests, special offers or promotions. We will share such information with

necessary third parties for the purpose of carrying out the contest, special offer or promotion. Your participation in the contest, special offer or promotion constitutes your consent to such disclosure and use of such information.

Please note that if you give out personal information online such as in a forum or message board, that information is not protected, is visible to the public and other visitors of the Site and can be collected and used by third parties. Although we strive to protect our users' privacy, we cannot guarantee the security of information you voluntarily post and we have no control over how such third parties may use your information. You disclose any personal information at your own risk.

In addition, you are responsible for the confidentiality of your information and password. You are responsible for all uses of your registration, whether or not authorized by you. You agree to immediately notify us of any unauthorized use of your registration or password.

### **Sharing of User Content on the Site**

When you voluntarily send us emails, questions, stories, photos and/or other User Content, you are authorizing us to use or post these materials on our Websites or in social media. Please note that we will not return any materials provided to us.

### **Changes to our Privacy Policy**

We keep our privacy policy under regular review and we will place any updates on this webpage. If we make material changes to the policy, we will notify you by email to the email address specified in your account and/or through a notice on the Website home page. You are responsible for ensuring we have an up-to-date active and deliverable email address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

This privacy policy was last updated on September 30, 2019.

### **How to Contact Us**

Please contact us via [support@adwallet.com](mailto:support@adwallet.com) if you have any questions about our privacy policy or information we hold about you.

### **Scope and Consent**

By applying or signing up for a AdWallet account, including through a computer or mobile device (“device”), you accept the terms of this Privacy Policy and consent to our collection, use, disclosure and retention of your information as described herein (including to contact you), and for all other purposes permitted under applicable personal information privacy statutes, credit bureau reporting rules, anti-spam legislation, and consumer protection laws.

### **Amendment**

We may amend this Privacy Policy from time to time by posting a revised version and updating the “Last updated” date above. The revised version will be effective at the time we post it. We will provide you with reasonable prior notice of substantial changes in how we use your

information, including by email at the email address you provide. We encourage you to review this Privacy Policy whenever you access or use in any manner any AdWallet application, product, service, feature, technology, content, or website (collectively, "Services") to stay informed about our information practices and the choices available to you and to contact us if you have any questions about these changes. Your continued use of our Services constitutes your acceptance of any amendment of this Privacy Policy.

### **Collection of Information**

Our Services can be used by a broad range of industries in connection with their products, services, activities and administrative functions, whether they are involved in government, retail, health, politics, human resources, technology or anything else. Accordingly, a broad range of information (including information about you) may be uploaded to or sent through our Services.

Without information about you, we may not be able to provide you with the Services or the support you request.

Our website and Services are not targeted or directed at children under the age of 13 and do not knowingly collect or store any personal information from children under the age of 13.

### **Information You Provide**

We can collect information you provide when you apply or sign up for a AdWallet account you voluntarily agree to provide personal information that will be used to send you targeted ads, offers, surveys and other information, and when you provide information as part of our identity or account verification process. We collect information about you, including:

- Identifying personal information, such as your name, email address, mailing address, phone number, photograph, birthdate, house hold income, and other demographic information and information about your interests and hobbies.
  - Financial information, including bank account and payment card numbers; to process transfer credits earned on Adwallet to you
- *\*this list is not exhaustive and is only illustrative of some of your personal information is required to create an account on AdWallet.*

We can collect information you provide when you participate in contests or promotions offered by AdWallet or our partners, respond to our surveys or otherwise communicate with us.

### **Information We Collect from Your Use of our Services**

We can collect information about you when you use our Services, including:

- **Transaction Information.** When you use our Services to make, accept, request or record payments or money transfers, we collect information about when and where the transactions occur, the names of the transacting parties, a description of the transactions, the payment or transfer amounts, and the devices and payment methods used to complete the transactions.
- **Location Information.** Through our applications, we collect information about the location of your device. For more information and to learn how to disable collection of location information, please see "Your Choices" below.
- **Device Information.** We collect specific information about your device when you access our Services, including your hardware model, operating system and version, unique

device identifier, mobile network information, and information about the device's interaction with our Services. We may also identify other software running on the device for anti-fraud and malware-prevention purposes (but will not collect any content from such software).

- **Use Information.** We collect information about how you use our Services, including your access time, browser type and language, and Internet Protocol ("IP") address.
- **Information Collected by Cookies and Web Beacons.** We use various technologies to collect information when you use our Services, including sending cookies to your device and using web beacons. Cookies are small data files that are stored on your hard drive or in your device memory when you visit a website or view a message. Among other things, cookies support the integrity of our registration process, retain your preferences and account settings, and help evaluate and compile aggregated statistics about user activity. For more information and to learn how to block or delete cookies used in the Services, please see "Your Choices" below. We also may collect information using web beacons. Web beacons are electronic images that may be used in our Services or emails. We may use web beacons to deliver cookies, track the number of visits to our website, understand usage and campaign effectiveness, and determine whether an email has been opened and acted upon.

### **Information We Collect from Other Sources**

We can also collect information about you from third parties, including third-party verification services, credit bureaus, mailing list providers, and publicly available sources. In some circumstances, where lawful, this information may include your government-issued identification number. By applying or signing up for a AdWallet account, you authorize and consent to our obtaining from, and disclosing to, third parties, from time to time, any information about you in connection with the processing of any credit investigation, identity or account verification, fraud detection, or collection procedure, or as may otherwise be required by applicable law. This includes, without limitation, the receipt and exchange of account or credit-related information with any credit reporting agency or credit bureau, where lawful, and any person or corporation with whom you have had, currently have, or may have a financial relationship, including without limitation past, present, and future places of employment and personal reporting agencies.

### **Third-Party Advertising and Analytics**

We may allow third-party service providers to deliver content and advertisements in connection with our Services and to provide anonymous site metrics and other analytics services. These third parties may use cookies, web beacons, and other technologies to collect information, such as your IP address, identifiers associated with your device, other applications on your device, the browsers you use to access our Services, webpages viewed, time spent on webpages, links clicked, and conversion information (e.g., transactions entered into). This information may be used by AdWallet and third-party service providers on behalf of AdWallet to analyze and track usage of our Services, determine the popularity of certain content, deliver advertising and content targeted to your interests, and better understand how you use our Services. The third-party service providers that we engage are bound by confidentiality obligations and other restrictions with respect to their use and collection of your information.

This Privacy Policy does not apply to, and we are not responsible for, third-party cookies, web beacons, or other tracking technologies, which are covered by such third parties' privacy policies. For more information, we encourage you to check the privacy policies of these third parties to learn about their privacy practices. For more information about targeted advertising

specifically, please visit <http://www.aboutads.info/choices>. To learn about how to manage cookies, please see “Your Choices” section below.

### **Use of Information**

We may use information about you to provide, maintain, and improve our Services, such as:

- Processing or recording payment transactions or money transfers;
- Displaying historical transaction;
- Developing new products and Services; and
- Delivering the information and support you request, including technical notices, security alerts, and support and administrative messages.

We may use information about you to improve, personalize and facilitate your use of our Services. For example, when you sign up for a AdWallet account, we may associate certain information with your new account, such as information about other accounts you had or currently have with AdWallet, and prior transactions you made using our Services. We also may use information about you to measure, customize, and enhance our Services, including the design, content, and functionality of our applications and websites, or to track and analyze trends and usage in connection with our Services.

We may use information you provide to connect you with people you already know. For example, you may upload contact information from your address book through the AdWallet mobile application.

We may use information about you to send you news and information, or to conduct surveys and collect feedback, about our Services and to communicate with you about products, services, contests, promotions, discounts, incentives, and rewards offered by us and select partners, based on your communication preferences and applicable law. We also may contact you to resolve disputes, collect fees, and provide assistance for problems with our Services or your AdWallet account.

We may use information about you:

- To protect our rights or property, or the security or integrity of our Services;
- To enforce the terms of our General Terms or other applicable agreements or policies;
- To verify your identity (e.g., some of the government-issued identification numbers we collect are used for this purpose);
- To investigate, detect, and prevent fraud, security breaches, and other potentially prohibited or illegal activities;
- To comply with any applicable law, regulation, legal process, or governmental request;
- For any other purpose disclosed to you in connection with our Services.

We may, and we may use third-party service providers to, process and store your information in the United States, and other countries.

### **Sharing of Information**

We may share information about you as follows:

- With our group companies, including our parent company, AdWallet, Inc., and other affiliates, for the purposes outlined above;

- With third parties to provide, maintain, and improve our Services, including service providers who access information about you to perform services on our behalf (e.g., fraud prevention, identity verification, and fee collection services), as well as financial institutions, payment networks, payment card associations, and other entities in connection with the payment or money transfer process;
- With third parties that run advertising campaigns, contests, special offers, or other events or activities in connection with our Services;
- With other users of our Services with whom you interact through your own use of our Services. For example, we may share information when you make or accept a payment, or money transfer using our Services;
- In connection with, or during the negotiation of, any merger, sale of company stock or assets, financing, acquisition, divestiture, or dissolution of all or a portion of our business;
- If we believe that disclosure is reasonably necessary (i) to comply with any applicable law, regulation, legal process or governmental request (e.g., from tax authorities), (ii) to enforce or comply with the terms of our General Terms or other applicable agreements or policies, (iii) to protect our rights or property, or the security or integrity of our Services, or (iv) to protect us, users of our Services or the public from harm or potentially prohibited or illegal activities; or
- With your consent.

We also may share aggregated information with third parties that does not specifically identify you or any individual user of our Services.

### **Security of Information**

AdWallet uses reasonable standards of confidentiality and security for adwallet.com and for the Personal Consumer Information collected from the site. We also restrict our own employees' access to Personal Consumer Information. However, it is possible that someone may intercept or access communications, transmissions and/or Personal Consumer Information. For site security purposes and to ensure that this service remains available to all users, AdWallet uses software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage.

Email is not a secure form of communication. For this reason, please do not send private or confidential information to us via email. If you do so, it is at your own risk. Some of the information you provide on adwallet.com may be transmitted securely via Secure Sockets Layer, or SSL. Credit Card information and other sensitive information is never transmitted via email.

You must also seek to protect against unauthorized access to any information that you use in connection with this Website, and you should remember to close the browser once you have completed your activities on the Website or if you have decided to step away from your computer. In the event that we determine that there has been a security breach resulting the unauthorized disclosure of Personal Consumer Information to a third party, we will notify consumers whose Personal Consumer Information has been so disclosed by posting such information on adwallet.com and, if email contact is possible, then we would send an email advising of the status.

For site security purposes and to ensure that this service remains available to all users, we use software programs to monitor network traffic to identify unauthorized attempts to upload or change information, or otherwise cause damage.

We take reasonable measures, including administrative, technical, and physical safeguards, to protect your information from loss, theft, misuse, and unauthorized access, disclosure, alteration, and destruction. We hold information about you at our own premises and with the assistance of third-party service providers. We restrict access to personal information to those AdWallet employees, contractors, and agents who need to know that information in order to transmit, store, or process it, who are subject to contractual confidentiality obligations consistent with this Privacy Policy, and who may be disciplined or terminated if they fail to meet these obligations. Our third-party service providers store and transmit personal information in compliance with this Policy and other appropriate confidentiality and security measures.

Nevertheless, AdWallet cannot guarantee that unauthorized third parties will never be able to defeat our security measures or use your personal information for improper purposes. In the event that any information in our possession or under our control is compromised as a result of a security breach, we will take reasonable steps to investigate the situation and, where appropriate, notify those individuals whose information may have been compromised and take other steps in accordance with applicable laws or regulations.

## **Marketing**

By signing up for an AdWallet account you consent to have your personal information used by companies who are affiliated with us to send you information about products and services. You have the right at any time to stop us from contacting you for marketing purposes or giving your information to our other companies or those affiliated with us. If you wish to no longer receive marketing messages your account will be terminated.

If you no longer wish to be contacted for marketing purposes, please email us at [support@adwallet.com](mailto:support@adwallet.com).

## **Your Choices**

### **Opt in or Opt out**

If you "opt in" to receive information from us or others, you can change your mind later. If at any time you would like to stop receiving such information or opt out of a feature, you may notify us at [support@adwallet.com](mailto:support@adwallet.com). You should be aware, however, that it is not always possible to completely remove or modify information in our databases and servers, although we will make reasonable efforts to do so upon your request.

### **Personal Information**

You may access, change, or correct information about you by logging into your AdWallet account at any time or by making a request to us using the contact details below, in which case we may need to verify your identity before granting access or otherwise changing or correcting your information.

### **Deactivating Your Account**

If you wish to deactivate your AdWallet account, you may do so by logging into your AdWallet account or by emailing us at [support@adwallet.com](mailto:support@adwallet.com). AdWallet generally retains information

about you only as long as reasonably necessary to provide you the Services. However, even after you deactivate your AdWallet account, we may retain archived copies of information about you and any transactions or Services in which you may have participated for a period of time that is consistent with applicable law, or as we believe is reasonably necessary to comply with applicable law, regulation, legal process, or governmental request, to prevent fraud, to collect fees owed, to resolve disputes, to address problems with our Services, to assist with investigations, to enforce our General Terms or other applicable agreements or policies, or to take any other actions consistent with applicable law.

### **Location Information**

In order to provide certain mobile applications, we may require location information, so if you do not consent to collection of this information, then you cannot use our corresponding Services. You can stop our collection of location information at any time by changing the preferences on your mobile device. If you do so, some of our mobile applications will no longer function. You also may stop our collection of location information via mobile application by following the standard uninstall process to remove all AdWallet mobile applications from your device.

### **Cookies**

We try to make your experience with AdWallet simple and meaningful. When you access or use the Services, our web server may send a cookie to your device. Certain cookies we use last only for the duration of your web or application session and expire when you close your browser or exit the application. Other cookies are used to remember you when you return to use the Services and, as such, will last longer.

We may use cookies to:

- Remember that you have visited us or used the Services before. This means we can identify the number of unique visitors we receive, which allows us to make sure we have enough capacity to accommodate all of our users.
- Customize elements of the promotional layout and/or content of our website or application.
- Collect anonymous statistical information about how you use the Services (including the length of your web or application session) and the location from which you access the Services, so that we can improve the Services and learn which elements and functions of the Services are most popular with our users.

Some of the cookies used in the Services are set by us, and others are set by third parties who deliver services on our behalf.

Most web and mobile device browsers are set to automatically accept cookies by default. However, you can change your browser settings to prevent automatic acceptance of cookies, or to notify you each time a cookie is set.

You also can learn more about cookies by visiting <http://www.allaboutcookies.org>, which includes additional useful information on cookies and how to block cookies on different types of browsers and mobile devices. Please note, however, that by blocking or deleting cookies used in the Services, you may not be able to take full advantage of the Services.

### **Do Not Track**

Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking across websites. We currently do not respond to DNT signals. We may

continue to collect information in the manner described in this Privacy Policy from web browsers that have enabled DNT signals or similar mechanisms.

### **Promotional Communications**

You may opt out of receiving promotional messages from AdWallet by following the instructions in those messages or by changing your notification settings by logging into your AdWallet account. If you decide to opt out, we may still send you non-promotional communications, such as digital receipts and messages about your account or our ongoing business relations.

### **State Privacy Rights**

Certain state laws permit residents to request certain details about information we disclose to third parties for direct marketing purposes. If you are a California resident, for example, and would like to request this information, you can contact us at the address listed below and request more information about California privacy rights.

### **Children Under The Age Of 13**

Our Website is not intended for children under 13 years of age. No one under age 13 may provide any information to or on the Website. We do not knowingly collect personal information from children under 13. If you are under 13, do not use or provide any information on this Website or on or through any of its features/register on the Website, use any of the interactive or public comment features of this Website or provide any information about yourself to us, including your name, address, telephone number, email address, or any screen name or user name you may use.

If we learn we have collected or received personal information from a child under 13 without verification of parental consent, we will delete that information once we have become aware or notified we have such information. If you believe we might have any information from or about a child under 13, please contact us at [support@adwallet.com](mailto:support@adwallet.com).

### **For European Union Users:**

#### **GDPR Rights**

The 9999 takes effect on May 25, 2018. This regulation standardizes data privacy laws across the European Union (EU). If you are within the European Union, you are entitled to certain information and have certain rights under the General Data Protection Regulation. Those rights include:

The right to access - You have the right to request us for copies of your personal data. We may charge you a small fee for this service.

The right to rectification - You have the right to request that we correct any information you believe is inaccurate. You also have the right to request us to complete information you believe is incomplete.

The right to erasure- You have the right to request that we erase your personal data, under certain conditions.

The right to restrict processing- You have the right to request that we restrict the processing of your personal data, under certain conditions.

The right to object to processing- You have the right to object to our processing of your personal data, under certain conditions.

The right to data portability - You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us at our email:

Or all us at:

Or write to us:

To the extent that you provided consent to the Company's processing of your personal data, you have the right to withdraw that consent at any time.

You have the right to lodge a complaint with a supervisory authority that has jurisdiction over issues related to the General Data Protection Regulation.

## **Contact**

Please contact our Privacy Department with any questions or concerns regarding this Privacy Policy.

AdWallet, LLC  
301 Central Ave. NW  
Albuquerque, NM 87102, U.S.A.  
support@adwallet.com

If you have any questions or concerns regarding our policy, or if you believe our policy or applicable laws relating to the protection of your personal information have not been respected, you may file a complaint with our Privacy Department listed above, and we will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concerns and may need to engage or consult with other parties in order to investigate and address your issue. We will keep records of your request and any resolution.