

PayLink Direct Privacy Policy

Effective Date: January 1, 2020

Welcome to the PayLink Direct Privacy Policy.

PayLink Direct, together with its affiliates, agents, and vendors (collectively, “PayLink Direct”, “us”, “we”, or “our”) takes the responsibility of protecting your privacy and safeguarding the personal information that you provide to us very seriously. The purpose of this privacy policy (“Privacy Policy”) is to inform you about the types of information we gather about you through our business relationship with you and when you access or use our digital properties, available at www.mypaylinkdirect.com and all related sites and mobile applications we may provide, and via other online submissions by you to PayLink Direct, (together, the “Website”), how we may use that information, and the choices you have regarding our use of that information. By accessing our Website, you accept our Privacy Policy. See our [Privacy Notice](#) for specific detail on information sharing and opt out rights.

A. UPDATES TO THIS PRIVACY POLICY

PayLink Direct reserves the right, at its sole discretion, to alter this Privacy Policy at any time without prior notice to any user of the Website, including to comply with privacy laws, regulations and/or our own or industry standards, or to reflect changes in our business practices. If we revise the Privacy Policy, we will notify you by posting the updated Privacy Policy on the Website. Changes to the Privacy Policy will become effective and will apply to the information collected starting on the date we post the revised Privacy Policy on the Website. Your continued use of our Website after any change has become effective will constitute your acceptance of any change. We encourage you to review this Privacy Policy each time you access or use the Website.

B. INFORMATION WE COLLECT

We typically collect the following kinds of information when you use our Website or otherwise interact with us through phone calls, payments channels or other contact:

(1) Personal Data: Our definition of “Personal Data” includes any information that may be used to specifically identify or contact you, such as your name, address, phone number, financial information such as a debit or credit card number, or vehicle information such as year, make, model, and VIN. Personal Data also includes information that may be used to identify you indirectly, including by reference to an online identifier, geolocation data, or a device identification number.

In certain circumstances, we may request, allow, or otherwise provide you an opportunity to submit Personal Data in connection with a feature, program, promotion, or some other aspect of our services. For instance, you may: (a) provide your name, mail address, email address, financial information, and phone number when registering with our Website’s online payment portal; or (b) provide certain demographic information about yourself (e.g., age, gender, purchase preference, usage frequency) when using our Website. Certain information may not be Personal Data when standing alone (e.g., your age), but may become so when combined with other information (e.g., your age and name). Whether you provide this information is your choice; in many instances,

however, this type of information is required to realize a benefit we may offer or gain access to certain content or features available through our Website.

(2) Usage Data: Our definition of “Usage Data” is any information that does not personally identify you that is automatically collected anytime you visit the Website, including information such as browser type and referring websites. Usage Data can include certain Personal Data that has been de-identified; that is, information that has been rendered anonymous. We may collect Usage Data from you when you access our Website with your device. Usage Data may include, but is not limited to, information regarding your computer, your IP address, the type of Internet browser you are using (e.g., Internet Explorer, Firefox, Safari, Opera), the location from which you are visiting the Website, the type of computer operating system you are using to access the Website (e.g., Vista, Windows XP, Mac OS, Android, iPhone), the domain name of the third party website from which your visit originated, the search terms you use on our Website, or the areas of the Website you visited and the actions you performed on the Website.

C. HOW WE COLLECT INFORMATION

We may collect information about you from a variety of sources:

(1) Directly From You. We collect Personal Data when it is voluntarily provided by, for example, completing our Website form to contact us, setup a customer account, call to customer service or make a payment.

(2) Third Party Sources. We may receive information about you from third party sources like automobile dealers, product sellers, product administrators, data providers and combine it with the data we collect from you or your use of our services or Website.

(3) Through Your Use of our Website. Our systems may record Usage Data as you use and navigate the Website. For example, our servers automatically record Usage Data that your browser transmits when you visit our Website. We also may automatically collect Usage Data about how you access and interact with the Website through the use of automated tracking technology.

(a) Cookies and Web Beacons: Cookies and web beacons allow us to automatically receive and store certain types of Usage Data whenever you interact with the Website. We may use cookies, which are small data files that are transferred to a web browser, which enables our Website to remember and customize your subsequent visit. We may also use third party applications, which may use cookies, to gather and analyze information about your browsing activities on the Website.

Cookies and other user tracking mechanisms (e.g., local shared objects), by themselves, do not tell us your email address or other Personal Data unless you choose to provide this information to us by, for example, registering at the Website. However, once you choose to furnish us with Personal Data, this information may be linked to the data stored in the cookie or other tracking mechanisms. We may use cookies and other user tracking mechanisms, including “persistent cookies”, which will remain on your computer even after you close your browser, to understand Website usage and to improve the content and offerings on the Website. We may use cookies to personalize your experience at the Website and to save your password in password-protected areas. We also may use cookies to offer you products, programs, or services. While most browsers are set to accept cookies and other tracking devices by default, you can set yours to refuse tracking devices or to

alert you before accepting them. However, by disabling tracking devices, you may not have access to the entire set of features on the Website. Please refer to your Internet browser's instructions to learn more about these functions.

Additionally, we may use web beacons, which are single-pixel, electronic images embedded in the Website that allow us to gather information about your browsing activities on the Website. We may use web beacons to improve your experience with the Website, including to provide you with content customized to your interests and to understand whether users read email messages and click on links contained within those messages so that the Website can deliver relevant content. Our web beacons may collect some contact information (for example, the email address associated with an email message that contains a web beacon).

(b) Do Not Track Features: Certain web browsers and other devices you may use to access the Website may permit you to indicate your preference that you do not wish to be “tracked” online. At this time, the Website does not respond to “Do Not Track” signals.

D. HOW WE USE AND DISCLOSE THE INFORMATION COLLECTED

As our business grows, we may seek to make available additional offerings and services including those that may not be related to vehicle payment plans, vehicle maintenance and repair programs or home service contracts. In doing so, we will strive to give our users choices about whether or not you would like to continue to receive future promotional or marketing communications from us either directly or on behalf of others whose offerings we think may be of interest to you. In identifying which offerings we think may be of interest to you, we may use and analyze information you have provided to us, to an affiliate or information we have otherwise collected from unaffiliated companies and sources. If you choose not to receive such marketing communications, we reserve the right to send you certain non-promotional communications to fulfill pending or ongoing services requested by you (such as service announcements), email and other communications related to the purchases you have made or information you have submitted, or similar administrative or transactional messages.

(1) Personal Data: The Personal Data you voluntarily submit to us is generally used to carry out your requests, respond to your inquiries, process payments, better serve you, or in other ways naturally associated with the circumstances in which you provided the information. We may also use this information to later contact you for a variety of reasons, such as customer service, providing you promotional information for our products or those of our affiliated and unaffiliated companies (subject to your communication preferences and opt out rights), or to communicate with you about content or other information you have posted or shared with us via use of our Website. We share and/or sell your Personal Data with contracted other companies in order for them to offer our customers service contracts and maintenance and repair programs.

You may direct that we not share your information with other companies or permit them to market to you based on shared information as more fully explained in our [Privacy Notice](#).

In certain instances, we may also share and/or sell your Personal Data with third parties performing functions on our behalf (or on behalf of our affiliated companies), accessing our Website (e.g.,

vendors that process credit card payments, provide us marketing or promotional assistance, analyze our data, or assist us with customer service).

(2) Usage Data: We use Usage Data in a variety of ways. For example, we may use Usage Data to evaluate use of our Website and all related sites and mobile applications we may provide, analyze site traffic, track purchases, understand customer needs and trends, carry out targeted promotional activities, and to improve our services. We may use Usage Data by itself or aggregate it with information we have obtained from others. We may, among other things, share Usage Data with our affiliated companies, allow third parties to collect such information directly from you, and/or sell the Usage Data to third parties to achieve these and any other business objectives (e.g., generate revenue, form alliances).

(3) General Uses and Disclosures: We use and share the information, including Personal Data, we collect from users for the purposes described below.

(a) Provision of Services to Website Users. If you use the Website, we will use your information to process and respond to your requests, comments, inquiries, and other forms you submit through the Website. For example, when you begin to provide Personal Data to us, you do so for the purpose of our sharing this information with third party providers to provide you with the quotes you requested.

(b) Processing Payments. We use Personal Data, such as financial information to process any payments, including disclosure of Personal Data to third party payment processors.

(c) Improving our Services. We use Personal Data and Usage Data to enhance our understanding of our users' preferences and optimize the performance of the Website.

(d) Disclosures to Service Providers. We share Personal Data and Usage Data with third party service providers that assist us with hosting, maintaining and analyzing online activity on the Website, processing payment card information, marketing our services, and managing our daily business operations. We share only the minimum amount of Personal Data with these service providers that they need to perform their tasks. We also enter into contracts with these service providers that require them to protect Personal Data.

(e) Marketing. When you submit information to us, you agree to receive email, direct mail and other forms of communications from us and those to whom you have authorized us to forward your Personal Data. If you would like to not receive promotional or marketing material from us in the future please contact us at the information provided below. Your decision to not receive promotional or marketing materials shall not preclude us from communicating with you regarding your existing or past relationship with us and shall not preclude us, including our employees, contractors and other representatives, from accessing and using the information you have provided in a manner that is permitted by law (such as using aggregate or anonymous form data). If you do not wish to receive further communications from any person or entity to whom we have forwarded your information, you must contact them directly.

(f) Advertising. We work with third party advertising partners to show you advertisements that we think may interest you. Advertising partners may collect or receive information about your viewing of or interaction with advertisements, including advertisements that you view within their websites. We may also share or sell Personal Data or Usage Data with advertising partners subject to opt out rights.

(g) Corporate Affiliates. Subject to applicable law, we may share Personal Data or Usage Data with our current or future “affiliates” (which means a parent company, any subsidiaries, joint ventures, or other companies under common control), in which case we will require our affiliates to honor this Privacy Policy and our [Privacy Notice](#).

(h) Law Enforcement and Legal Processes. We share Personal Data or Usage Data with law enforcement, government officials, regulatory agencies, or other parties when we are permitted or required to do so by applicable law. We may also disclose Personal Data or Usage Data to comply with a judicial proceeding, court order, subpoena, or legal process. We may use and/or disclose Personal Data or Usage Data with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect against fraud and credit risk reduction purposes; or (d) protect or defend our legal rights or property of our Website, or other users.

(i) Protection of Individual’s Vital Interests. In emergency situations, we will use or share Personal Data or Usage Data when doing so is necessary to protect an interest that is essential for an individual’s life.

(j) Other Legitimate Interests. We may use and disclose Personal Data or Usage Data when necessary for our legitimate interests, as long as such interests are not overridden by our users’ interests, rights, and freedoms with respect to their Personal Data.

(4) Transfer of Assets: As we continue to develop our business, we may sell or purchase assets. We may share your Personal Data or Usage Data with others in connection with or during negotiation of any merger, financing, acquisition, bankruptcy, dissolution, transaction or proceeding involving sale, transfer, divestiture or disclosure of all or a portion of our business or assets to another company.

(5) Legal Bases for Processing: The legal bases for processing Personal Data or Usage Data for the purposes described above or elsewhere in this Privacy Policy, including in Section C above, are, without limitation, that (1) it is necessary to perform a contract with you (sale of goods or services) or in order to take steps at your request prior to entering into a contract; (2) it is necessary to comply with a legal obligation (such as notifying you of Privacy Policy changes); or (3) it is necessary for the pursuit of our legitimate interests or those of a third party.

(6) Your California Privacy Rights: Under certain provisions of the California Civil Code § 1798.83, residents of the State of California have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed certain

personally identifiable information as defined under California law during the preceding year for third party direct marketing purposes. You are limited to one request per calendar year. You also have the right to request personal information to be deleted, with some exceptions. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. You may request the information in writing as provided in Section I below.

The California Consumer Privacy Act of 2018 (“CCPA”) does not apply to personal information we collect, process, sell, or disclose that is covered by the federal Gramm-Leach-Bliley Act (Public Law 106-102), and implementing regulations.

E. CHILDREN

We do not market to and do not knowingly collect any Personal Data from or about a child under the age of 13 without the consent of the child’s parent or legal guardian. If we discover that we have inadvertently collected information from a child under 13 years of age, we will promptly take all reasonable measures to delete such information from our systems.

F. KEEPING YOUR INFORMATION SECURE

We have implemented security measures we consider reasonable and appropriate to protect against the loss, misuse, and alteration of the information under our control. Please be advised, however, that while we strive to protect Personal Data and privacy, we cannot guarantee or warrant the security of any information you disclose or transmit to us online or through our Website or applications, and are not responsible for the theft, destruction, or inadvertent disclosure of Personal Data. We will notify you in the event we become aware of a security breach involving your “personal data” (as the term or similar terms are defined by any applicable law requiring notice upon a security breach) stored by or for us. If you have not provided a direct mailing address we may notify you by email to the last email address you have provided us.

G. OTHER SITES AND THIRD PARTY LINKS

Our Website may link to or contain links to third party websites that we do not control or maintain, such as in connection with purchasing products we may recommend or reference via our Website and/or advertisements you may see while using our Website. We are not responsible for the privacy practices employed by any third party website and encourage you to carefully read the privacy policies and statements of those websites.

H. INDIVIDUALS IN THE EUROPEAN ECONOMIC AREA

The European Union (EU) General Data Protection Regulation (GDPR) provides individuals in the European Economic Area with the following rights:

- To access the Personal Data we maintain about you;
- To be provided with information about how we process your Personal Data;
- To correct your Personal Data;
- To have your Personal Data erased;
- To object to or restrict how we process your Personal Data; and

- To request your Personal Data to be transferred to a third party.

To exercise the above rights, please contact us at the information provided above. We will consider and process your request within a reasonable period of time. Please be aware that under certain circumstances, the GDPR may limit your exercise of these rights.

I. CORRECTING/UPDATING PERSONAL DATA

If you would like to update or modify your Personal Data, you may do so by contacting us at the contact information listed below. Further, if you would like to not receive emails or other communications directly from us, you may do so by following any instructions included in the email or other communication or by contacting us at the contact information listed below.

Email: customerservice@paylinkdirect.com

Phone: 800-839-7940

Mail: ATTN: 222 S. Riverside Plaza #950, Chicago IL 60606

We will respond to your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Please note that we may not be able to fulfill certain requests while allowing you access to certain benefits and features of our Website.