



## Privacy Policy

Thank you for visiting a website owned by YapStone, Inc. (“we”, “us” and “our”). Your privacy is important to us. In order to better protect your privacy, we have developed this privacy policy (“**Privacy Policy**”). The Privacy Policy explains our information practices and the choices you can make about the way your information is collected and used at this website and our services. The Privacy Policy is based on these principles:

- We will disclose how we use the information we collect;
- We will give you an opportunity to restrict our use of the information;
- We will give you an opportunity to tell us not to give the information to others; and
- We will give you an opportunity to correct the information in our records when it has been erroneously recorded.

These principles and our policy apply whether we collect the information by paper or electronic form.

The Privacy Policy (together with our Terms of Service on our websites, a written or online agreement we may have entered into with you, and any other policies published on our websites) sets out the basis on which any personal or business data (“Personal Data”) we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your Personal Data and how we will treat it.

By submitting data to YapStone you consent that your data may be used in accordance with the terms of this Privacy Policy.

### 1. Information We May Collect from You

We may collect and process the following data about you:

- Information that you provide by filling in forms, applications, or our customer due diligence procedures. This includes information provided at the time of registering for our services, engaging in a transaction, establishing recurring transactions, or requesting further services. We may also ask you for information when you report a problem with our website.
- If you contact us, we may keep a record of that correspondence regardless of the means.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.
- Details of transactions you carry out through our services and of the fulfillment of your transactions.
- Details of your visits to our websites including, but not limited to, traffic data, location data, weblogs and other communication data, whether this is required for our own purposes or otherwise and the resources that you access.
- When you initiate a payment transaction, we also collect financial information such as credit card, debit card, or bank account details.



- For verification purposes we reserve the right to request proof of identification in an offline format. This may include passport, driver's license, utility bill, company information, or other items we deem necessary to establish identity, residence, or place of business. Such proofs of identification may be stored electronically on our servers in order to comply with our legal and regulatory obligations.
- Your IP address, computer information, and access times may be tracked against your records with us for purposes of preventing fraud, establishing your identity, and creating an audit trail when using the services of YapStone.
- Competitions or give-aways may be made available on our websites from time to time. You do not have to participate in these, however if you choose to you may be asked to disclose some personal information. At the time of entering the competition it will be made clear to you who will have access to your personal information and why. You are not obliged to continue with your competition entry, however if you do so you accept that you may receive a prize.

## 2. IP Addresses, Cookies and Click-through URLs

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration, to perform fraud and risk checks, and to report aggregate information to our partners. This is statistical data about our users' browsing actions and patterns, and does not identify any individual. We will not sell or rent the information collected to third parties to be used for marketing purposes.

For the same reasons, we may obtain information about your general Internet usage by using cookies. Cookies contain information that is transferred to your computer's hard drive. A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser, and stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server. This enables the web server to identify and track the web browser. They help us to improve our website and to deliver a better and more personalized service. They enable us:

- To estimate our audience size and usage pattern.
- To store information about your preferences, and to allow us to customize our website according to your individual interests.
- To speed up the delivery of pages you commonly use.
- To recognize you when you return to our website.

We may use both "session" cookies and "persistent" cookies on our website. Session cookies will be deleted from your computer when you close your browser. Persistent cookies will remain stored on your computer until deleted, or until they reach a specified expiry date. You may refuse to accept cookies by activating the setting on your browser that allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of our website. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our website.

We may use third party cookies to help us improve our website design and user experience. Please note that our partners may also use cookies, over which we have no control.

We may occasionally use a "click-through URL". When you click one of these URLs, you pass through our web server before arriving at your final destination. We track click-throughs to help us improve the user experience, determine your interest in particular topics and measure the effectiveness of our customer communications.

Please be aware that YapStone is not responsible for the privacy practices of other sites. We encourage our users to be aware when they leave our website to read the privacy statements of each and every website that collects personally identifiable information.

## 3. Where We Store Your Personal Data

The data that we collect from you will be processed, and stored in the United States. By submitting your personal data, you agree to this transfer, storing or processing in the United States. YapStone will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.



All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password that enables you to access certain parts of our service or engage with our customer service team, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access.

#### **4. Uses Made of the Information**

We use information held about you in the following ways:

- To ensure that content from our websites is presented in the most effective manner for you and for your computer.
- To allow smooth interaction between you and customer support.
- To provide you with information about our products or services or third party products or services which we feel may be of interest to you.
- To carry out our obligations arising from any contracts entered into between you and us or if you are a renter, between us and the property owner.
- To allow you to participate in interactive features of our service, when you choose to do so.
- To notify you about changes to our services.
- To perform the necessary due diligence on our customers to ensure you are who you say you are, and to reduce the risks of chargebacks and fraud in our system.
- To build fraud and credit risk models to assist in the screening of users for the purposes of identifying fraudsters, preventing fraud and minimizing associated credit risk.

We will not disclose your information to any other third parties except with your explicit permission or as permitted in section 5 of the Privacy Policy.

#### **5. Disclosure of Your Information**

We may disclose your personal information to any member of the YapStone group of companies. We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If YapStone International Limited, or YapStone, Inc. or substantially all of their assets are acquired by a third party, in which case personal data held by it about customers may be one of the transferred assets.
- In order: (i) to comply with any legal obligation (including reporting obligations under fraud, anti-money laundering, and counter terrorist financing law); (ii) to order, enforce or apply the Terms of Service or your written agreement with us; (iii) to order, enforce or apply provisions of any agreement with you; or (iv) to protect the rights, property, or safety of YapStone, or one of YapStone's group companies, our customers, or others.
- For the purposes of fraud protection, credit risk reduction, and to prevent and monitor for money laundering.
- In the event a third party provides services to us that facilitate the provision of our services to you.
- Pursuant to a valid request or subpoena from law enforcement, regulators, or other government body.
- With your permission.

#### **6. Your Rights**

Our website may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.



## **7. Changes to the Privacy Policy**

Any changes we may make to the Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by e-mail one month prior to the change becoming effective. If we are going to use your personal information in a manner different from that stated at the time of collection we will notify you via e-mail, if one was provided to us. You will have a choice whether or not to allow us to use your information in this new manner. If you do not contact us stating your refusal to accept the changes to the Privacy Policy within the one-month notice period, you will be deemed to have accepted the changes. If you refused to accept the changes, we may be required to shut down or terminate your ability to use the Services. However, if your account with YapStone has been suspended or closed then you will not be contacted and your information will not be used in this new manner.

## **8. Contact Us**

Questions, comments and requests regarding the Privacy Policy are welcomed and should be addressed to: Legal Department, YapStone, Inc., 2033 North Main Street, Suite 510, Walnut Creek, CA 94596.

