

**Privacy Policy**  
**May 21, 2008**  
**Wise Payment Systems, INC**

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**BBB OnLine Privacy Program**

Your privacy is important to us. By participating in the Council of Better Business Bureau's BBBOnLine Privacy Program we have made a commitment to meet the program's strict requirements regarding how we treat your information and have it verified by BBBOnLine. Further information about this program is available at [www.bbbonline.org](http://www.bbbonline.org).

All BBBOnLine Privacy Program participants are required to work with the program's dispute resolution process. The Privacy Program will only accept complaints regarding the misuse of personally identifiable information by a website operator. For more information about the Privacy Program dispute resolution process visit, [www.bbbonline.org/privacy/dr.asp](http://www.bbbonline.org/privacy/dr.asp).

**Our Commitment to Privacy**

Thank you for visiting the Wise Payment Systems, Inc. (referred to in this policy as "WPS") website. Safeguarding your privacy is our priority at WPS. We understand the importance of confidentiality and trust when handling personal and private information. Our Privacy Statement is designed to inform you about our online collection and use of personal information. As our services at Wise Payment Systems, INC evolve, we may revise this policy, so please check back frequently.

**The Only Personal Information We Collect Online is that Information You Voluntarily Provide to Us.**

We do not collect consumer information at this site. The only information we collect about you online is information that you voluntarily provide to us. This information may include, for example, a company name or an e-mail address. If you supply WPS with personal or business contact information on this web site, you will only be contacted so that we can provide you with the information you have requested, to follow up on job opportunities you have inquired about, or, if you are a business, to occasionally send you other information about WPS and its services that we believe you would find appealing. If you do not wish to receive this information you may opt out by emailing [optout@joinwps.com](mailto:optout@joinwps.com), and we will remove your business from any further calls, mailings, or emails.

## **When You Browse the WPS Website, You Do So Without Revealing Your Identity.**

This WPS website uses cookies, which are identification files that track your web browsing activity, only to aggregate information about the sites that users visit so that we can update and redesign, as necessary, our website in order to provide you with the most useful information. We also use them to track resumes submitted online. Personal information, such as your e-mail address, is not collected, unless you provide it to us. WPS does not disclose domain name or aggregate information to third parties other than vendors who assist us with our website and who are under strict confidentiality requirements.

## **We Are Committed to Protecting the Confidentiality of Your Information.**

WPS' policies limit access to personal user information that is collected from this website to only those employees of WPS and its affiliates who need the information to fulfill their business responsibilities. WPS may disclose personal user information collected online to companies affiliated with WPS surrounding employment opportunities within the companies. Vendors and other outside contractors we engage are subject to our contractual requirements to ensure that sensitive personal information is protected. Employees must adhere to WPS' Online Privacy Statement in addition to WPS' Privacy Principles. Employees violating the WPS Online Privacy Statement or the WPS Privacy Principles are subject to disciplinary action, up to and including dismissal.

## **We Use Appropriate Security Safeguards.**

At WPS, security is a priority and very important to us. WPS employs appropriate measures, including advanced technology, to protect personal information collected online against unauthorized access, disclosure, alteration or destruction. These may include, among others, encryption, physical access security, computer firewalls and other appropriate technologies. WPS reviews and enhances its security systems, as necessary.

## **WPS' Website May Be Linked to Other Websites.**

WPS may provide links to third-party websites. WPS is not responsible for the content or privacy practices employed by websites that are linked to our website. WPS is not responsible for any losses or damages in connection with the information, security, privacy practices, availability, content or accuracy of materials of such third party sites. These third party sites might have a privacy policy different from that of WPS and third party sites may provide less security than WPS's site. You should review their privacy and security policies, before you share any nonpublic personal information.

## **WPS' Website is Not Directed at Persons Under the Age of 18.**

Our web site is not directed at persons under the age of 18. WPS does not collect or maintain information at our website from people who we actually know are under the age of 18.

## **We Hold Ourselves Accountable Under Our Privacy Principles.**

WPS is committed to meeting the highest standards for our privacy program. A senior Wise Payment Systems, Inc. official serves as the company-wide privacy officer with responsibility for administering the privacy program. If you have any questions or comments about the WPS Online Privacy Policy, or to access or correct your information we have on file please contact:

By phone: (800)-387-6458

By fax: (877) 226-4471

By email: [privacy@joinwps.com](mailto:privacy@joinwps.com)

By mail:

Wise Payment Systems, Inc. Senior Officer  
Wise Payment Systems  
8477 Fishers Center Drive  
Fishers, IN 46038

This WPS online privacy statement is currently applicable to only U.S. customers and visitors to this website. International businesses may have their own rules and practices, which are consistent with their own privacy statements. They may alter their statements as needed for certain products/services and to abide by local laws and customs.

## **Wise Payment Systems, Inc. ("WPS") Privacy Principles**

All of our consumers and businesses rely on WPS for safe and reliable payment services. Our relationships are established based on mutual trust. Each day, we strive to reinforce our commitment to our business customers and consumers.

In order to provide these services, WPS must collect, maintain and use financial and other sensitive personal information.

WPS' Privacy Principles guide us in the collection and use of information and reinforce the role our employees play in protecting consumer privacy.

Our business customers may adopt other principles applicable to their collection and use of information or simply customize these principles.

WPS may modify its policies as appropriate for particular products and services or to comply with local laws and regulatory requirements around the world.

## *WPS Privacy Principles*

### **1. WE OBTAIN PERSONAL INFORMATION THAT IS NEEDED TO PROVIDE OUR GOODS AND SERVICES.**

We primarily receive personal information as a result of consumers' financial transactions with business customers of WPS or a WPS processing customer. Generally, WPS does not obtain personal information directly from consumers. However, in the event WPS collects information directly from consumers, we will obtain the personal information that is needed to provide our goods or services, to provide customer service and to fulfill any legal or regulatory requirements. When we obtain information about consumers from third parties, we use reputable sources, including public repositories.

### **2. WE WILL INFORM CONSUMERS ABOUT THE GENERAL USES OF THEIR INFORMATION.**

Generally, WPS does not have a direct customer relationship with consumers. However, in the event we have a direct relationship with consumers, we will strive to make information available to them about the general uses of the information that we collect. Generally, WPS obtains personal information about consumers indirectly through our business customers and channels. To that end, we encourage our business customers and channels to provide these consumers with a timely and complete privacy notice.

### **3. WE ARE COMMITTED TO PROTECTING THE CONFIDENTIALITY OF PERSONAL CONSUMER INFORMATION.**

Within WPS, access to personal information is limited to those employees of WPS and its affiliates who need it to fulfill their business responsibilities. Employees must adhere to WPS Privacy Principles. Violation of the Privacy Principles can result in disciplinary action up to and including dismissal.

When WPS collects information on behalf of our business customers and alliances, we handle the information based on their direction and in accordance with our agreements and contracts with them and applicable laws.

Vendors and other outside contractors we engage are subject to our contractual requirements to ensure sensitive personal information is safeguarded. For purposes of credit reporting, verification and risk management, we may share information about consumers with third parties. We will also disclose consumer information in response to a lawful request issued by a court, government agency or regulatory authority with the jurisdiction to make that request.

#### **4. WE STRIVE TO GIVE CONSUMERS CHOICES ABOUT HOW THEIR DATA WILL BE USED.**

If we obtain personal information as part of a direct relationship with consumers, we will not share this information with non-affiliated third parties except in accordance with these Privacy Principles; to provide products and services; to facilitate and complete consumer-initiated or authorized transactions and service requests; to comply with federal, state and local laws, including credit reporting laws and card association rules; to combat fraud or identity theft; or to offer products and services that WPS believes may be of interest to its customers.

#### **5. WE USE APPROPRIATE SECURITY SAFEGUARDS.**

At WPS, security is a priority. We employ appropriate measures to protect consumer information against unauthorized access, disclosure, alteration or destruction. These may include, among other things, encryption, physical access security, computer firewalls and other appropriate technologies. WPS reviews and enhances its security systems, as necessary.

#### **6. WE HOLD OURSELVES ACCOUNTABLE TO OUR PRIVACY PRINCIPLES.**

WPS is committed to meeting the highest standards for our privacy program. A senior official of WPS serves as the company-wide privacy officer, with responsibility for administering the WPS privacy program, including implementation of these Privacy Principles.

If you have any questions or comments about the WPS Privacy Principles, please contact:

Wise Payment Systems, Inc. Senior Officer  
Wise Payment Systems  
8477 Fishers Center Drive  
Fishers, IN 46038