

Privacy Policy – OrbisPay

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This Privacy Policy is designed to empower and inform you about your privacy while using OrbisPay Services.

General

Orbis Financial Technologies, Inc. ("OrbisPay," "we," "us" and/or "our") is dedicated to protecting your personal information and informing you about how we use it. This privacy policy (the "Privacy Policy" or the "Policy") is intended to provide information to our visitors ("you," "your") about how we collect, protect, share and use your information as part of our technology platforms, including, without limitation, our company website (the "Site"), mobile sites and/or applications (together with the Site, the "Services"). This Privacy Policy outlines how and when OrbisPay collects, protects, shares, and uses information that can identify you individually ("Personal Information"), such as your name, email, date of birth, social security number, telephone number, employment information, financial information (such as paycheck information, account information (including account balance and transaction history) or debit card numbers), or identifiers and login information, such as your username and password, or a security token.

Personal Information does not include information that is anonymous, aggregated, or can no longer be used to identify you as an individual.

Please be sure to read this entire Privacy Policy before using or submitting information through the Services. By using or submitting information through the Services, you are indicating that you agree to be bound by the terms of this Privacy Policy. This Privacy Policy is incorporated into OrbisPay's Terms of Services at OrbisPay.me/terms. Any capitalized term that is not defined in this Policy shall have the meaning given to it in the Terms of Services. This Privacy Policy covers the privacy practices of OrbisPay only. This Policy does not apply to the practices of third-party websites, services or

applications, including third parties with which we partner. These third-party services are governed by each such third party's privacy policy. OrbisPay is not responsible for the privacy policies and practices of technology platforms other than that of OrbisPay, and OrbisPay is not responsible for the failure of third parties to honor their privacy obligations. By including a link to a third party's website, we do not endorse or recommend any products or services offered or information contained at the third-party website. If you decide to visit a third-party website via a link contained on the Services, you do so at your own risk.

Information We Collect

When you interact with us through the Services, we may collect Personal Information and other information from you, as further described below:

Personal Information That You Provide Through the Services

We collect Personal Information from you when you provide such information, such as when you create an account ("Account"), complete and/or use one of our online forms, tools or content items, contact us with inquiries, respond to one of our surveys, or use certain Services. If you sign up for the Services, you will be asked to provide Personal Information such as your email address, first and last name, telephone number, date of birth, Social Security number, banking information, government issued ID, alias or unique personal identifier, signature, usernames and passwords, and other information that identify you. We may also collect Personal Information such as education, audio, and visual information about you if you participate in surveys or research.

Information We Collect Automatically

Site Usage Information: OrbisPay may use a variety of technologies that passively or automatically collect information about how the Services are accessed and used, including your browser type, device type, operating system, application version, the pages served to you, the time you browse, preceding page views, and your use of particular features of the Services. This statistical data helps us understand what is

interesting and relevant to users of the Services so that we can best tailor our content to you.

Our Site also may collect personal information using cookies, which are small text files that are saved to your browser. You may have the ability to accept or decline cookies using your web browser settings. If you choose not to accept cookies from the Services, you may not be able to take full advantage of its features or to receive some of the services that it provides. To learn more about cookies and your ability to opt-out of certain advertising cookies, please visit the following websites: <http://www.aboutads.info/choices> or <http://www.networkadvertising.org/choices>.

Device Identifiers: OrbisPay also automatically collects an IP address or other unique identifier for the computer, mobile device, technology or other device (collectively "Device") you use to access the Services. A "Device Identifier" is a number that is automatically assigned to your Device when you access a web site or its servers, and our computers identify your Device by its Device Identifier. We may use a Device Identifier to, among other things, administer the Services, help diagnose problems with our servers, analyze trends, track users' web page movements, monitor against theft and fraud, and gather broad demographic information for aggregate use. If you access the Services on a mobile Device, we may request access to settings and location information for similar purposes and to personalize your experience with the Services. Most mobile devices allow you to turn off location services or push notifications.

Session Trackers: In operating the Services, we may use cookies and similar session tracking technologies ("Session Trackers"). Session trackers help provide additional functionality to the Services, customize users' experiences with the Services and help us analyze Services usage more accurately for research and product development purposes. We (including third parties that we work with) may place session trackers on your Device for security purposes, to facilitate navigation of the Services, and to personalize your experience while using our Services. If you would prefer not to accept Session Trackers when using the Services, follow the instructions provided by your website or mobile browser (usually located within the "Help", "Tools" or "Edit" facility) to modify your Session Tracker settings. Please note that if you disable Session Trackers,

you may not be able to access certain parts of our Services and other parts of our Services may not work properly. As a result, we recommend that you leave Session Trackers turned on when accessing the Services because they allow you to take advantage of some of the Services' features.

Web Beacons: In addition to Session Trackers, we may use web beacons (also known as "clear GIFs"), which are transparent graphic images placed on a web page or in an email and indicate that a page or email has been viewed or tell your browser to get content from another server. We use web beacons to measure traffic to or from, or use of, our online forms, tools or content items and related browsing behavior and to improve your experience when using the Services. We may also use customized links or other similar technologies to track hyperlinks that you click and associate that information with your Personal Information in order to provide you with more focused communications.

Non-Personal Information: Additionally, we may modify and combine Personal Information in a manner that does not personally identify you or any other individual and thus, no longer constitutes "Personal Information". We may use this non-Personal Information, such as aggregate user statistics, demographic information, and usage information, for any lawful purpose.

Information from Third Parties

We may receive information about you from third parties.

Information from your Employer: We may receive Personal Information about you from your employer. We compare this information with the Personal Information we request from you when you use the Services in order to verify your employment. In addition, we may receive additional information about your employment from your employer, including your start and end dates, location of your workplace, pay period, pay rate, work schedule, and job title.

Information from other Parties: If you choose to connect bank or other accounts to our Service, we may also receive information from other Third Parties about the financial transactions on those accounts. If you choose to connect your time and attendance, payroll or other human resources information systems by providing your username and password to us through our Service, we may also obtain employment information about you from those Third Parties. When you provide username and password information, you give OrbisPay the authority to act on your behalf to access your Personal Information from the relevant financial service provider or other entity that holds your Personal Information. The information we receive from the financial service providers or other entities varies depending on the information made available by those providers. In general, we collect the following types of information from your financial service providers and other entities: account information, account transaction history, identifiers and information about the account owner, employment information, time and attendance information, and payroll information, including, but not limited to, gross pay, net pay, pay period, and employment status. We may also receive Personal Information about you from the third parties, such as financial data vendors or financial services companies with whom we've partnered, to evaluate your eligibility for an Account, to enhance our ability to tailor our services to you, or for other reasons. If we combine such data with information we collect through the Services, such information is subject to this Privacy Policy, unless we have disclosed otherwise.

Plaid Technologies, Inc. ("Plaid"): We use Plaid to gather your data from financial institutions. By using the Services, you grant us and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with the Plaid Privacy Policy located at <https://plaid.com/legal/>.

How We Use Information

We may use the information we collect for a variety of reasons related to our operation and maintenance and your use of the Services. We may combine information about you that we collect online, via mobile applications, and from third-party sources.

Examples of specific ways in which OrbisPay may use your Personal Information include, but are not limited to the following:

1. Assessing your eligibility for an Account;
2. Configuring your Account settings;
3. Responding to your requests (including, for example, if you contact us to ask a question or report an issue with the Services, we may use the Personal Information you provide to verify your identity, answer your question or resolve your issue);
4. Processing transactions and payments;
5. Improving the content, appearance and utility of the Services, including through analytics;
6. Tracking your use of the Services for internal research purposes and to enhance our product messaging to you;
7. Providing necessary notices to you and notifying you about updates to the Services;
8. Communicating with you about your Account and use of the Services;
9. Debugging to identify and repair errors that impair existing intended functionality;
10. Detecting security incidents, protecting against malicious, deceptive, fraudulent, or illegal activity, and prosecuting those responsible for that activity;
11. Providing interactive features, such as product reviews or research surveys; and

12. Undertaking internal research for technological development and demonstration.

Marketing or promotional purposes

Email Communications: We may use your Personal Information to provide you with marketing or other promotional communications via email. If, at any time, you would like to stop receiving these promotional e-mails, you may follow the opt-out instructions contained in any such e-mail. Please note that by opting out, you may prohibit OrbisPay from informing you of offerings that may be of interest to you. It may take up to ten business days for us to process opt-out requests. If you opt-out of receiving emails or promotions from us, we still may send you e-mails about your Account or any products or services you have requested or received from us, or for other customer service purposes.

Short Message Service ("SMS") Communications. We may use your Personal Information to provide you with marketing or other promotional communications via SMS. If, at any time, you would like to stop receiving promotional text messages, you may opt-out by texting the word "STOP" to 617.970.1467. You may also reply "STOP" to any message you receive from us. Upon receipt of your "STOP" message, we will send you a SMS message to confirm that you have been unsubscribed. At that point, you will no longer receive any further marketing or other promotional SMS messages from OrbisPay. If you need any assistance, you can text the word "HELP" to 617.970.1467 or reply "HELP" to any message you receive from us. Upon receipt of your "HELP" message, we will respond with "STOP" instructions and a reference to our Terms and Conditions and Privacy Policy. Please note that by opting out, you may prohibit OrbisPay from informing you of offerings that may be of interest to you.

When do we disclose the Personal Information we collect?

Except as provided herein, OrbisPay will not sell, rent or otherwise disclose Personal Information about you to third parties.

Third party providers. We may share your Personal Information with unaffiliated third parties that provide certain services to us, including, but not limited to data analysis, payment processing, and risk management. These third parties may have access to Personal Information or non-Personal Information in order to perform their functions on our behalf. However, these third parties are only permitted to use your Personal Information for the purpose for which it has been provided or to administer, service or process transactions that you have authorized, and may not disclose it to any other third party except at our express direction and in accordance with this Policy. We do not share your Personal Information with: (1) other financial companies for joint marketing purposes; (2) affiliated companies for their everyday business purposes; or (3) any third parties so that they can market to you.

Employer Partners: We may share limited Personal Information with your employer, including your name, employee identification number, place of employment, and information related to your paycheck, along with non-Personal Information, such as your partial account number, to facilitate providing the services, for joint marketing purposes, or to enhance your use of OrbisPay's service. We will not disclose to your employer Personal Information concerning your use of the Services other than as necessary to provide the Services, the transactions to or from your bank account, the balance of your account, or Personal Information regarding your individualized financial situation.

Financial Services Partners: We may share Personal Information with other financial services companies with whom we have partnered to provide a greater array of products to you. These financial services companies do not operate on our behalf but, in certain instances, their services or products may be accessed through the OrbisPay application. It will be clear who is providing the service or product. If you choose to accept these services, we may exchange your information, including your Personal Information. This exchange of information is necessary to maintain business operations and to provide the ongoing service you've requested. By requesting or accepting these products or services, you are permitting us to provide your Personal Information to the other party. In addition, you will be presented with, and you should review, the privacy policies of these financial services companies as each of these parties' services are governed by its own privacy policy.

Business Transfers: As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or our assets, or assets related to the Services, Personal Information, information about how the Services are accessed and used, and any other information that we have collected about the users of the Services may be disclosed to such entity as one of the transferred assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

Legal disclosures. OrbisPay may transfer and disclose information, including your Personal Information, information about how the Services are accessed and used, and information from our service providers, to third parties to comply with a legal obligation; when we believe in good faith that the law requires it; at the request of governmental authorities conducting an inquiry or investigation; to verify or enforce our Terms and Conditions or other applicable policies; to respond to an emergency; or otherwise to protect the rights, property, safety or security of third parties, visitors to our Services or the public.

With your permission, and at your direction or request, we may share your Personal Information with specified third parties.

Other Business Activities: We may share Personal Information to conduct any other legitimate business activities not otherwise prohibited by law.

Your Privacy Rights and Information Retention

If you wish to modify, verify, correct, delete, or update any of your Personal Information collected through the Services, you may edit your Account information or contact us at support@OrbisPay.me.

In accordance with our routine record keeping, we may delete certain records that contain Personal Information you have submitted through the Services. We are under no obligation to store such Personal Information indefinitely and disclaim any liability

arising out of, or related to, the destruction of such Personal Information. In addition, you should be aware that it is not always possible to completely remove or delete all of your information from our databases without some residual data because of backups and other reasons.

We will retain your Personal Information as long as your Account has not been deactivated, or as needed to provide you services, comply with our legal obligations, resolve disputes, or enforce our agreements. An Account will be considered "deactivated" if you affirmatively request that we deactivate your account by emailing us at support@OrbisPay.me . We will deactivate a user Account promptly within 30 days of receiving your written request.

Security of your Personal Information

OrbisPay maintains reasonable administrative, technical and physical safeguards to protect your Personal Information. OrbisPay restricts authorized access to your Personal Information to those persons who have a legitimate purpose to know that information to provide products or services to you and those persons you have authorized to have access to such information. However, no electronic data transmission or storage of information can be guaranteed to be 100% secure. Please note that we cannot ensure or warrant the security of any information that you transmit to us. You use the Services and provide us with your Personal Information at your own risk.

Your Account is authenticated using SMS Device verification for your privacy and security. You need to prevent unauthorized access to your Account and Personal Information by implementing and protecting your Device password appropriately and limiting access to your Device. We also recommend that you change your Device password periodically. You are responsible for maintaining the security of your password PIN. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your Account or Device has been compromised), you must immediately notify us of the problem by contacting us at support@OrbisPay.me and immediately change your password PIN via the Services.

If you are a California resident, your California Privacy Rights are:

Under the California Consumer Privacy Act, California residents have the right to:

Request that a business delete any personal information about the consumer which the business has collected from the consumer.

Request that a business that collects personal information about the consumer disclose to the consumer, free of charge, the following:

- The categories of personal information that it has collected about that consumer.
- The categories of sources from which the personal information is collected.
- The business or commercial purpose for collecting or selling personal information.
- The categories of third parties with whom the business shares personal information.
- The specific pieces of personal information it has collected about that consumer.

Request that a business that sells the consumer's personal information, or that discloses it for a business purpose disclose, free of charge, to the consumer:

- The categories of personal information that the business collected about the consumer.
- The categories of personal information that the business sold about the consumer and the categories of third parties to whom the personal information was sold, by category or categories of personal information for each third party to whom the personal information was sold.

- The categories of personal information that the business disclosed about the consumer for a business purpose.

Direct a business that sells personal information about the consumer to third parties not to sell the consumer's personal information.

We will not discriminate against you because you exercise any of the rights as described in this section.

If you would like to request this information, please email your request to support@orbispay.me. In your request, please specify that you want a "Your OrbisPay California Privacy Rights Notice". Please allow 45 days for a response.

California Do Not Track Disclosures

OrbisPay does not track you across third party websites to provide targeted advertising and therefore does not respond to Do Not Track (DNT) signals. Nor do we knowingly authorize third parties to conduct online tracking through OrbisPay Services.

Consent to Processing and Transfer of Information

The Services are governed by and operated in accordance with the laws of, the United States, and are intended for the enjoyment of residents of the United States. If you use the Services, or otherwise provide us with data, from outside the United States, you acknowledge and agree that your Personal Information may be transmitted outside your resident jurisdiction. In particular, please note that your Personal Information may be stored and processed in the United States. The laws pertaining to the collection, use, disclosure and protection of Personal Information in the United States may be more or less stringent than the laws of other countries. By using the Services, you (a) acknowledge that the Services are subject to the laws of the United States; (b) consent to your Personal Information being stored and processed in the United States and handled as described in this Policy; and (c) waive any claims that may arise under the

laws of the country where you reside, are a citizen, and/or from where you access the Services.

Changes to this Policy

This Policy is the sole authorized statement of OrbisPay's practices with respect to the collection of Personal Information and the subsequent use and disclosure of such information. Any summaries of this Policy generated by third party software or otherwise shall have no legal effect, are in no way binding upon OrbisPay, shall not be relied upon in substitute for this Policy, and neither supersede nor modify this Policy. OrbisPay may revise this Policy from time to time without prior notice to you, and any changes will be effective immediately upon the posting of the revised Privacy Policy within the Services as indicated by the "Last Updated" date located at the top of the Policy. You should bookmark and periodically review this page to ensure that you are familiar with the most current version of this Policy. You can determine when this Policy was last revised by checking the "Last Updated" legend at the top of the Policy.

How can you ask questions about this Policy?

If you have any questions or concerns about this Policy, please contact us at support@orbispay.me.