



**Relay Payments Inc.
Privacy Policy**

Effective Date: August 18, 2022

Relay Payments Inc. and its subsidiaries and affiliates (collectively, "Relay") are committed to protecting the privacy of our employees, customers, and others interested in our business.

RelayPayments.com and the websites and applications thereunder are owned and operated by Relay. Relay collects personal and non-personal information of users of our websites and services. This Policy applies to all personal data when you visit our websites or use our services. We provide this Privacy Policy in order to describe and explain to users our information collection practice and our commitment to data security and can be used to help you understand your privacy choices.

Contact Information

If you have any questions or concerns in connection with Relay's information collection practice summarized in this Statement, please send an email, with the subject heading "Privacy Policy Question," to privacy@relaypayments.com. In the email, please state your questions or concerns. Our postal address is:

Relay Payments Inc.
Attn: Legal and Compliance/Privacy
400 Galleria Way, Suite 500
Atlanta, GA 30339

You may also submit questions regarding our Privacy Policy via our web form available at relaypayments.com/legal/privacy-data-subject-request.

If you have any questions about our Services, please contact us at (877) 735-2910.

The Types of Personal Data That We Collect

Relay collects personal data from data subjects (including job applicants) and users who visit our public-facing web site, as well as information from the individual representatives of our corporate customers, suppliers and business partners ("Business Contacts"). This information may include:

From potential customers:

- Name;
- Phone number;
- Home, business, and e-mail addresses;
- Financial and bank information;
- Corporate entity information;
- Department of Transportation (DOT) or Motor Carrier (MC) information;

- Geolocation information; and
- IP address

From job applicants:

- Name;
- Phone number;
- E-mail addresses;
- Driver's license or passport or other I-9 information;
- Social security number;
- Marital status;
- Family member information;
- Financial information;
- Professional career/employment information; and
- Healthcare information

From Website visitors:

- IP address;
- Geolocation information;
- Device information;
- Cookies

Depending on the activity or service a user desires, we also may request additional personal information. For example, when you contact us by e-mail or through a contact form, the information you provide (your e-mail address, your name and telephone number if applicable) will be stored and/or processed by us to answer your questions or for marketing purposes. If you establish a Relay account with us, we also collect personal data as necessary to perform the Services you request.

We may also use non-personal information such as demographic or geographic data to analyze and develop our marketing strategy. For example, we may use non-personal information to determine how you found out about us, what your interests are regarding our services and products, and how to further improve our websites for your use or to aid in our prevention and detection of fraud pursuant to laws and regulations.

We also collect and use information about any transactions performed via our Services. This may include information about the device you use (device type, IP address), the location of your use, or information about the parties subject to the transactions.

We may also collect business information from third party sources such as data providers or credit bureaus where permitted by law.

See additional information below:

- **Contest/Sweepstakes Entries**

From time to time, we may offer online entries into contests or sweepstakes. The information collected from the entry will only be used for the purpose of conducting the contest or sweepstakes (such as to notify winners) or for marketing purposes (to inform potential customers of our products and services). If you agree to receive additional information from us as part of the entry form, you will consent to our use of your contact information to send additional materials to you. You can request to be removed from our mailing list at any time contacting us per the above.

- **Server Log Information**

We log IP addresses to analyze trends, administer the site, track patterns of page views, and gather broad demographic information, such as browser type, for aggregate use.

Relay does not, however, link IP addresses collected from website visits to personally identifiable information. Aggregated data therefore will not personally identify you or provide information about your personal use of Relay services. IP addresses, however, may be linked to personally identifiable information in connection with Services provided to ensure transaction authenticity and completion and to detect fraud.

- **Cookies**

Relay, in common with many web site operators, may use standard technology called cookies on this site. Cookies are small data files that are downloaded onto your computer when you visit a particular web site. You can disable cookies by turning them off in your browser, however, some areas of this site may not function properly if you do so. We use cookies to recognize you as a customer, tailor our services to you, or detect and prevent fraud.

Purpose and Legal Basis for the Processing of Personal Data

Relay processes personal data for the purposes of:

- Communicating with corporate business partners and customers pursuant to contract about business matters or possible contracts for the operation of the business, including the process of requested payments (services) and providing aggregated, anonymized data about the use of our services;
- Monitoring and analyzing transactions by reviewing customer and user behavior to improve services and prevent fraud;
- Conducting relevant tasks for legitimate business purposes including marketing and advertising;
- Evaluating job candidates, profiling prospective customers, or building mailing lists for product information distribution;
- Human Resources administration and internal communications;
- Meeting legal or regulatory requirements and Relay's internal policies;
- Management of travel, lodging, and related expenses; and
- Other purposes disclosed at the time of collection.

For EEA Visitors to the Relay websites and those applying for employment with Relay, the basis for processing personal data is consent. For all other data subjects, such processing has been determined to be limited to processing based on the contractual or legitimate interest of Relay and the respective data subject in order to promote a business or employment relationship, as applicable. For example, this would include Relay providing you with additional product offerings based on certain cookies and other information collected pursuant to your consent by visiting this website or requesting more information.

We only retain personal data for the time necessary to provide our services and fulfill business purposes, or as required by law. If a customer account is closed, we may be required to retain certain information by law.

Recipients of Personal Data

We do not sell or rent, or otherwise provide the personal information collected on Relaypayments.com or any of its affiliated websites or applications to third parties that are not under contractual obligations to Relay for business related processing (sub-processor or vendor). Third parties under contractual obligations may provide Relay with certain business required services such as performing identity verification or assisting in the processing of transactions, including third-party account connections (credit card, banks). We may, however, disclose your personal information when required by law or in the good-faith belief that such disclosure is necessary to comply with laws or for fulfilling business purposes such as payment processing or to meet legal obligations relating to Know Your Customer and Anti-Money Laundering laws.

We disclose data to our service providers, such as our data hosting, customer service, or email providers, or financial institutions that provide services. We may also share personal data or other information to the extent you authorize a third-party service or account to be connected to your Relay account for further services. We authorize such service providers to use or disclose the data to perform services on our behalf and to comply with applicable legal requirements. Service providers are contractually committed to protect the security and confidentiality of the data.

Transfer of Personal Data to a Third Country

Personal data collected by Relay is stored or processed only in the United States.

Retention Period

Personal data is retained by Relay no longer than necessary to execute its obligations to former employees to provide post-employment benefits or under applicable contracts with clients or business partners. Other information may be kept indefinitely due to requirements of federal regulations and other legal reasons.

Access Modification and Deletion of Personal Information - PROCEDURE

You are permitted to exercise Your right to access, correct, restrict, object to, update, move, or delete any personal data collected and stored by Relay. Relay may have a legitimate or legal

basis to retain certain personal information. Relay will respond to all requests within 30 days. To make such a request, please use the privacy portal available at relaypayments.com/legal/privacy-data-subject-request. Alternatively, you may email privacy@relaypayments.com or send a letter to:

Relay Payments Inc.
Attn: Legal and Compliance/Privacy
400 Galleria Way, Suite 500
Atlanta, GA 30339

Please help us keep your data accurate by informing us of any personal information change promptly.

There may be cases where restrictions on the amount of information that can be disclosed to data subjects under applicable law (for example, if that would necessarily involve disclosing information about another person). Relay is permitted to withhold some types of personal data in certain circumstances, subject to applicable law requirements. If there is a dispute, please contact Relay at the above address. In addition, data subjects have the right to lodge a complaint with a local supervisory authority.

Our Commitment to Data Security

This site incorporates appropriate safeguards using industry standard technology to heighten the security, accuracy and privacy of any personal information we have collected and we have put in place reasonable precautions to protect information from loss and misuse. Our security and privacy policies are periodically reviewed and enhanced as required in compliance with SOC II standards.

Minors

Our Services are not directed to minors, including children under the age of 13.

Choice/Opt-in

When we ask for information from you, you are given the opportunity to 'opt-in' to receive additional information, such as site announcements, promotional information, product sampling opportunities and research requests from us and to allow us to share your contact information with certain of our trusted partners and customers. Users who no longer wish to receive these communications, or who do not want their contact information shared as described herein, may stop receiving them by following the Unsubscribe instructions included in any communication or by contacting us at the information above. Customers, however, may still receive transaction related information as necessary for the provision of services as agreed to pursuant to Relay's General Terms and Conditions.

Additionally, to the extent we collect device information, you may restrict such access via the settings provided by your device.

Changes to this Statement and Policy

If we alter our Privacy policy, any changes will be posted on this page of our site so that you are always informed of the information we collect about you, how we use it and the circumstances under which we may disclose it. Please check back from time to time to ensure you are aware of our current privacy policy.

We appreciate your interest and hope that you enjoy the Relay website and services.

Additional Contact Details

If at any time you wish to contact Relay with any question or complaint or to exercise any of the rights set out in this privacy policy statement you may do so by contacting Relay by any of the methods set out below:

Postal Address:

Relay Payments Inc.
Attn: Legal and Compliance/Privacy
400 Galleria Way, Suite 500
Atlanta, GA 30339

Phone number:

1(877) 735-2910

E-mail:

privacy@relaypayments.com

California Specific Terms:

If you are a consumer located in California, we process your personal information in accordance with the California Consumer Privacy Act ("CCPA"). You have a right to receive notice of our practices at or before collection of personal information.

CCPA Rights and Choices. As a California consumer, you have choices regarding our use and disclosure of your personal information:

- You may request that we disclose to you the personal information we have collected about you. You also have a right to request additional information about categories of personal information collected, sold, or disclosed; purposes for which this personal information was collected or sold; categories of sources of personal information; and categories of third parties with whom we disclosed this personal information.
- You may request that we delete the personal information we have collected on you, subject to certain limitations under applicable law.

- The CCPA provides that you may not be discriminated against for exercising these rights.

To submit a request to exercise any of the rights described above, please email us at privacy@relaypayments.com. You may designate, in writing or through a power of attorney, an authorized agent to make requests on your behalf to exercise your rights under the CCPA. Before accepting such a request from an agent, we will require the agent to provide proof it is authorized. We also verify your identity prior to execution of any request by asking you to email us from your email address on file.