



**Relay Payments Inc.
Privacy Policy**

Last Modified Date: March 16, 2023

Relay Payments Inc. and its subsidiaries and affiliates (collectively, "**Relay**", "**we**", "**our**", or "**us**") are committed to protecting the privacy of our customers and others interested in our business. RelayPayments.com and its associated websites and applications (the "**Site**") and services provided thereunder (the "**Services**") are owned and operated by Relay.

We provide this Privacy Policy in order to describe and explain our information collection practice, our commitment to data security, and our process to exercise privacy rights. This Privacy Policy ("**Privacy Policy**") applies to information collected from the Services, the Site or any other website that links to this Privacy Policy which collects personal information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or household, as defined by applicable privacy laws ("**Personal Information**").

By accessing and using the Site containing a link to this Privacy Policy, receiving the Services, or otherwise providing us with Personal Information, you agree to the terms and conditions of this Privacy Policy and any updates we make to it. If you do not agree to the terms and conditions of this Privacy Policy, then please do not provide us with your information. Please note, however, that if you choose to limit the information that you provide to us while using the Site, you may not be able to use or participate in certain features of the Site.

Changes and Updates to this Privacy Policy

We reserve the right to revise or update this Privacy Policy at any time, and you should periodically read the Privacy Policy to learn of any revisions or updates. If the revision or update is material, we will provide you notification via email or a pop-up banner; however, for non-material revisions or updates, we will notify you by posting the revised or updated Privacy Policy and its "Last Modified Date" on the Site. Using the Site thereafter constitutes your agreement to and acceptance of the Privacy Policy and its revisions or updates.

1. Collection of Personal Information

Relay collects Personal Information regarding users who visit our public-facing web site and individual representatives of our corporate customers, suppliers and business partners ("**Business Contacts**") (collectively, "**you**", "**your**"). We collect Personal Information about you in various ways, including:

- Directly from you;
- Automatically when you use the Site; and
- From third parties.



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1.1. Information Provided by You

Relay may collect Personal Information directly from you when you use the Site. For example, when you contact us by e-mail or through a contact form, apply for a line of credit, or when you establish a Relay account with us.

- **Identifiers**, including name, telephone number, postal address, email address, Department of Transportation (DOT) or Motor Carrier information;
- **Information Listed in the California Customer Records Statute**, including name, postal address, telephone number, financial and bank information; and
 - You may be required to provide financial and bank information prior to purchasing the Services. Please note, Relay does not store financial and bank information; such information is securely processed and stored by Treasury Prime, our payment processor. Your information will be handled in accordance with [Treasury Prime's privacy policy and practices](#). We are not responsible for Treasury Prime's privacy practices. For more information, please contact Treasury Prime.
- **Credit Line Information**, including name, title, telephone number, and email address.
 - If you are applying for a line of credit from Relay on behalf of your business, you may be required to provide certain information about Business Contacts and the business. Please note, Relay will share such information with banks, financial institutions, trade reference sources, credit reporting agencies, and others (collectively, "**Credit Agencies**") to obtain relevant credit information, and thereby determine whether to extend the line of credit. For more information, please refer to our [Credit Terms](#).

1.2. Information Automatically Collected by the Site

Relay and third-party service providers may automatically collect data about you when you use the Site. This information is primarily needed to maintain the security and operation of the Site, and for our internal analytics so that we can improve the Services and Site. This information includes:

- **Identifiers**, including IP address and cookies; and
- **Internet or Other Electronic Network Activity Information**, including browsing history, browser and device information, hardware model, software, preferred language, unique device identifiers, advertising identifiers, network information, clickstreams, search history, information regarding your interaction with the Site, IP address, cookies, pixel tags, browser version, operating system.



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Cookies

Relay, in common with many website operators, may use standard technology called cookies on the Site. Cookies are small data files that are downloaded onto your computer when you visit a particular website. You can disable cookies by turning them off in your browser, however, some areas of the 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.

Google Analytics

We use Google Analytics on the Site to help us analyze the traffic on the Site. For more information on Google Analytics' processing of Personal Information, please see <http://www.google.com/policies/privacy/partners/> You may opt out of the use of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

Do-Not-Track

Many web browsers include a Do Not Track ("DNT") feature or setting that signals your preference not to have data about your online browsing activities monitored and collected. However, there is currently no uniform standard for recognizing and implementing the DNT signals. As such, Relay does not monitor or respond to DNT browser requests. If a standard is adopted that we must follow in the future, then we will inform you about that practice in a revised version of this Privacy Policy.

1.3. Information from Third Parties

In addition to collecting some Personal Information directly from you, we may collect Personal Information from third parties including our Affiliates and Subsidiaries, data providers, contractors and Credit Agencies where permitted by law. You agree that the third-party providers of data, not Relay, are responsible for maintaining your information with proper and sufficient accuracy and authority in accordance with all governing laws and regulations. We make no effort to verify any information for any purpose, including accuracy, legality, or non-infringement that we properly receive from third parties.

We may receive location information related to you from our service providers and contractors, with whom we have contracted with to provide the Services or certain features of the Site. Relay does not collect your location information from your individual device, nor do we store such information. Your location information may be obtained from point-of-sale transactions, when you log into a device and request a reservation, or when you use a Relay code. When you use any such service or feature, you authorize the relevant third party to collect and use your location information for the purpose for which it was collected. This information may be used to operate and enhance the third party's service as well as customize the content we provide to you from our partners.

We may also receive information about you from social media platforms, such as when you interact with us on those platforms or access our social media content. Please note that the information we may receive from those third-party sites (such as Facebook, Instagram, Twitter, TikTok, YouTube, and Google) is governed by the privacy settings, policies and/or procedures of the applicable



platform, and we strongly encourage you to review them before submitting any information using a social media platform.

2. Purpose of Collection

Relay processes Personal Information 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;
- Profiling prospective customers or building mailing lists for product information distribution;
- 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.

3. Disclosure of Personal Information

We do not sell, share, rent, or otherwise disclose the Personal Information collected from the Services or on the Site, including on Relaypayments.com or any of its affiliated websites or applications, to third parties for monetary or other valuable consideration, unless otherwise stated below or with your consent:

- **Service Providers & Contractors.** We may share your Personal Information with service providers and contractors to perform tasks on our behalf and to assist us in providing the Services, including but not limited to internal and business operations, security, payment processing, identity verification, credit checks (if you apply for a line of credit), and related services. Service providers and contractors may use the information only as necessary to provide the services to us and are contractually required to keep your information confidential and secure.
 - **Treasury Prime.** We use Treasury Prime as our payment processor. For more information on [Treasury Prime's privacy policy and practices](#), please visit their website.
- **Financial Institution and Business Partners.** We may share your Personal Information with our financial institution partners and business partners to provide you with a product or service you have requested. We may also share your Personal Information to business partners with whom we jointly offer the Services.
- **Credit Agencies.** We may share your Personal Information, such as your name, title, company name, email, phone number and any monetary value, with Credit



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Agencies to verify your credit, and determine if you are eligible to apply for a line of credit from Relay.

- **Advertising Partners.** We may share your Personal Information with third-party advertising partners, such as LinkedIn, Instagram, Twitter, TikTok, YouTube, and Google Display Advertising and Remarketing services. These advertising partners may use first- and third-party cookies together to inform, optimize, and serve ads based on your past visits to the Site. You can opt out of these services using the Ads Preferences Manager or you can use the Google Analytics opt-out browser add-on. These advertising partners may use this information (and similar information collected from other services) for purposes of delivering personalized advertisements to you when you visit digital properties within their networks, commonly referred to as “interest-based advertising.”
- **Authorized Representatives.** If another individual is managing your account on your behalf (for example, a wife managing the account of her husband), as authorized by you or as a personal representative under applicable law, that person can view all Personal Information about you in the Site.
- **In the Event of Merger, Sale, Divestitures or Change of Control.** We may transfer or assign Personal Information to an entity that acquires or is merged with us as part of a merger, acquisition, sale of ownership or assets, or other change of control.
- **Other Disclosures.** We may disclose your Personal Information if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, audit process, legal process or governmental request; (ii) enforce our Terms of Use or Terms of Sale, including investigations of potential violations thereof; (iii) detect, prevent, or otherwise address fraud or security issues; or (iv) protect against harm to our, your, or third parties’ rights, property, or safety.

We may share de-identified and/or aggregate analytics with third-party partners about how users interact with the Services, including usage patterns for certain programs, content, services, advertisements, promotions, and/or functionality available through the Services.

4. Contest and Sweepstakes Entries

We occasionally offer sweepstakes and contests. To participate in these online sweepstakes, we may require you to register and provide us with Personal Information, such as your name and email address. This Privacy Policy applies to sweepstakes we may administer online through the Site or other social media or digital platforms. Some sweepstakes we advertise may be administered by third parties who would collect your information, and you should review the privacy policies of the administering party to understand how your data is used and protected by them. In sweepstakes we offer, we will use the information you provide us for purposes including administering the sweepstakes, subscription to our newsletter, and other purposes disclosed at the time of registration. You should carefully review the Official Rules of any sweepstakes or contest in which you participate, including any option to opt-out of receiving special offers and marketing material by unchecking the appropriate box when registering for



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sweepstakes. If you have any questions or concerns, please contact us via the [Contact Us](#) section below.

5. Transfer of Personal Information to a Third Country

The Site and Services are hosted in the United States and are intended solely for visitors located within the United States. If you do not reside in the United States and provide Personal Information to us, please note that your Personal Information will be transferred, processed, collected, used, accessed and/or stored in the United States and subject to U.S. laws. The laws in the United States may not provide the same protections for your Personal Information as the jurisdiction in which you are located. Do not provide your Personal Information to us if you do not want this information to be transferred or processed outside of your country, or if the laws in your country restrict such transfers.

6. Retention Period

Personal Information is retained by Relay no longer than necessary to fulfill the purposes set out in this Privacy Policy, unless a longer retention period is required (such as under applicable contracts with clients or business partners) or permitted by law (such as tax, accounting, or other legal requirements).

7. Third-Party Sites

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or websites that may be displayed to you in search results, websites that may include the Services, or other websites linked from the Site. This Privacy Policy does not cover the information practices of other companies and organizations who advertise the Services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

8. Confidentiality and Security

We maintain 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. While we implement these measures, please note that 100% security is not possible, and we cannot guarantee that the security measures we have in place to safeguard Personal Information will never be defeated or fail, or that those measures will always be sufficient or effective.

Relay may assign you a user ID and a password as part of your participation and access to the Site and your account. Only you may use your user ID and password. You may not share your user ID and password with anyone else, and you are solely responsible for maintaining and protecting the confidentiality of your user ID and password. You are fully responsible for all activities that occur under your user ID. You play a role in protecting your information as well.



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9. Minors

The Services are not directed to minors, including children under the age of 16. We do not knowingly collect or solicit Personal Information from children under the age of 16. By using the Site or Services, you represent that you are at least 16 years old. If you are under 16, please do not attempt to register for an account or send any Personal Information about yourself to us. If we become aware that we have inadvertently received or collected Personal Information from a user of the Site who is under the age of 16, we will attempt to immediately delete that information from our files and records. Furthermore, we encourage users of the Site that are minors that are 16 years of age or older to ask their parents or guardians for permission before sending any information about themselves over the Internet.

If you believe a child who is under the age of 16 has provided us with Personal Information, please contact us using the information below.

10. Choices About Your Personal Information

You have choices about how we use your information. Please understand that if you choose not to disclose information to us, it may affect your ability to use some features of the Services.

10.1. Marketing. From time to time if you have supplied your email address, Relay and its affiliates may send you marketing or informational emails. If you prefer not to receive any or all of our marketing and promotional communications, you may opt-out of these communications by following the opt-out prompts on these communications. You also may ask us not to send you other marketing or informational communications by contacting us as specified in the [Contact Us](#) section below, and we will honor your request. Please note that even after you are removed from our marketing lists, we may still send you non-promotional communications, such as responding to your support requests.

10.2. Advertisements. Advertisements appearing on the Site may be delivered by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by us and does not cover the use of cookies by any advertisers.

We and our service providers may use information about your interactions with the Site to predict your interests and select the ads you see on and off the Site. This is known as interest-based advertising. In providing interest-based ads, we follow the Self-Regulatory Principles for Online Behavioral Advertising developed by the Digital Advertising Alliance ("DAA"). For more information about interest-based advertising and how you can opt out, visit:



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- Digital Advertising Alliance: <http://www.aboutads.info/choices>
- Network Advertising Initiative: <http://www.networkadvertising.org/choices/>

11. Correcting & Updating Your Information

Please help us keep your data accurate by informing us of any Personal Information changes promptly. To update your information or discontinue the Services, please use one of the methods in our [Contact Us](#) section below.

Relay will respond to your correction or update request within 10 business days. You also may be able to update your information by logging into your account.

12. Contact Us

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 Parkway, Suite 500
Atlanta, GA 30339

You may also submit questions via our [web form](#) or call us at **+1 (877) 735-2910**.