

July 15, 2024

Privacy Policy

Description

This Privacy Policy ("**Privacy Policy**" or "**Policy**") explains how Payvus LLC, and/or its affiliates ("**Affiliate(s)**"), (collectively "**Payvus**", "**we**", "**our**", or "**us**") collects, stores, uses, discloses and otherwise processes "**Personal Data**" (as defined below) collected when customers ("**Customers**", "**you**" or "**yours**") visit our website payvus.com, (the "**Site**") to apply for the products and services offered by us and/or through our "**Business Partners**" as further defined and outlined below.

Who We Are

Payvus provides a credit card services platform (the "**Platform**") to enable us and/or companies with whom we directly contract ("**Business Partners**") to offer credit card products and related services to Customers (the "**Services**"). Cross River Bank is one of our Business Partners and the issuer of your credit card. For further information on how Cross River Bank collects your Personal Data, please see [Cross River Bank's Privacy Policy](#).

About the Services

We provide the Services through our Platform directly to Customers and via our Business Partners who utilize our Platform to service Customers. Payvus and its Business Partners provide offerings including but not limited to:

- Account Servicing and Administration—customer service operations, which includes responding to account-related inquiries and complaints; web-based platforms to allow Customers access to and management of online accounts; and payment and debt collection services.
- Fraud Detection—to ensure the security of Customer accounts Payvus and its Business Partners provide services to identify and prevent fraud, including identity theft; and to perform necessary screenings of Customers in accordance with applicable laws and regulations.
- Marketing—our Business Partners provide direct mail, digital, and email marketing services to allow Payvus to offer new products and services.

How Your Personal Data is Collected

During the normal course of business with Payvus, Payvus and our Business Partners may collect data such as your name, email address, postal address, phone number and other information ("**Personal Data**") you provide via the Site when, for example, you request information about the Services, apply for credit through the Services, or provide feedback

about the Services. Payvus and our Business Partners also collect "**Sensitive Personal Data**", which is a subset of Personal Data, such as your social security number, and/or banking or payment information, Sensitive Data is used by Payvus and our Business Partners, such as Plaid, Under and credit reporting agencies, to (1) establish an account with Payvus and (2) to access and transmit financial information, such as account balance and deposits from your financial institution. Any Sensitive Personal Data processed by Payvus shall be retained and stored in accordance with applicable law and will not be used for any other purpose other than the purpose for which it was collected as set forth in this Policy. Any Sensitive Personal Data processed by our Business Partners shall be retained and stored in accordance with applicable law and the Business Partner's privacy policy.

If you agree to sign up for Payvus's marketing and communications emails ("**Marketing and Communications Services**") Payvus will collect and retain your Personal Data, specifically your email address, for so long as you subscribe to Payvus' Marketing and Communications Services. You may opt-out of Payvus' Marketing and Communications Services at any time by selecting the unsubscribe link in your emails or by contacting us at optout@payvus.com . If you utilize the Platform and sign up for Services and are the recipient of an Payvus credit card your Personal Data will be collected and processed in order to provide you the Services ("**Business and Operations Services**").

Cookies

We use automatic data collection technologies ("**Cookies**") to collect certain Personal Data as you interact with our Site, including information about your website visits, traffic data, browsing actions, and patterns. The Personal Data collected through Cookies is used to improve the Services we offer to you and to ensure a seamless visit to our Site.

Our Business Partners may also use Cookies, including Cookies to track your online sessions ("**Sessions Cookies**"), to collect Personal Data about your online activities over time in order to improve services offered; and to provide you with the necessary functionality to navigate their websites ("**Strictly Necessary Cookies**"). You may not opt out of Sessions Cookies and/or Strictly Necessary Cookies.

Our Business Partners may also use Google Analytics to collect Cookies. To opt-out of Google Analytics Cookies please click here <https://tools.google.com/dlpage/gaoptout?hl=en>.

How your Personal Data is Used

Payvus and its Business Partners may use Personal Data collected via the Site and Platform to facilitate the Services, specifically to:

- Administer your account;
- Confirm your identity, verify your account and account activity;
- Monitor suspicious or fraudulent activity and to identify violations of terms;
- Provide more tailored Services to you;

- Send you requested product or service information, with your consent, including newsletters and/or marketing emails in the provision of Marketing and Communications Services;
- Send you related information, including statements, technical updates, additional service offerings, account alerts and confirmation and other support and administrative messages in the provision of Business and Operations Services;
- Provide you with product information and support services offered on our Site or with respect to the Services;
- Administer our Site and Platform;
- Resolve technical issues, and respond to Customer service requests;
- Conduct research and development, and
- For testing and monitoring Services and in response to any regulatory inquiry.

Disclosure of Your Personal Data

Data privacy and security rules and regulations (“**Data Protection Laws**”) require that companies protect Personal Data including a prohibition on selling and sharing your Personal Data (as those terms are defined under Data Protection Laws) and other obligations contingent upon whether a company is a controller/business or processor/service provider as those terms are defined under Data Protection Laws.

Our Affiliates and Business Partners, who are acting on our behalf, assist us in providing Services to you, including data storage, maintenance services, hosting services, database management, web analytics, payment processing services, and transaction processing. Our Business Partners may disclose your Personal Data as outlined in their respective privacy policies and terms of use and any other agreement between you and the Business Partner (collectively “**Disclosures**”). Please carefully read and review our Business Partners’ Disclosures to ensure you understand how your Personal Data is disclosed.

Payvus and our Business Partners may disclose your Personal Data as required by law to comply with a subpoena or similar legal process or when we or our Business Partners, in good faith, believe that disclosure of your Personal Data is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request.

If Payvus or one of Payvus’ Affiliates is involved in a merger, acquisition or sale of all or a portion of its assets, Personal Data that is disclosed through the Platform may be disclosed as part of such merger, acquisition or sale. You will be notified via email and/or a prominent notice on our Site of any change in ownership or use of your Personal Data, as well as any choices you may have regarding your Personal Data.

Data Retention

Personal Data collected by our Business Partners will be retained and maintained as outlined by the Business Partners’ Disclosures. Payvus may retain your Personal Data in accordance with applicable law and as outlined in this Privacy Policy.

Data Security

The security of your Personal Data is important to us. We and our Business Partners follow accepted industry standards to prevent unlawful destruction, loss, alteration, unauthorized disclosure of or access to your Personal Data and use appropriate technical and organizational measures, as required under Data Protection Laws, to protect your Personal Data. Such technical and organizational measures may include physical access controls, encryption, internet firewalls, intrusion detection and network monitoring. Payvus and our Business Partners, where applicable, are also required to comply with Payment Card Industry (PCI) standards.

US Data Protection Laws

The California Consumer Privacy Act, The Virginia Consumer Data Protection Act, The Colorado Privacy Act, and the Connecticut Data Protection Act (collectively "**US Data Protection Laws**") place limitations on businesses which process the Personal Data of consumers in those respective states. As Payvus does not sell or share your Personal Data or otherwise process your Personal Data, as outlined under US Data Protection Laws, Payvus is not obligated to provide Customers with those consumer privacy rights.

Accessing, Correcting and Deleting Your Personal Data

If you have a question regarding your Personal Data or would like to exercise your privacy rights under US Data Protection Laws, please reach out to us at privacypolicy@payvus.com.

Privacy Policy Changes

We may periodically update this Privacy Policy. When we do, we will also revise the "**Effective Date**" of the Privacy Policy. If we make any material changes, additional notification will be provided, such as a statement on the Site.

We encourage you to review this Privacy Policy periodically to stay informed of our privacy practices.

Questions and Contact

For questions about this Privacy Policy please contact us at: privacypolicy@payvus.com or

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