

## BRIGHTWELL NAVIGATOR PRIVACY POLICY

Brightwell Payments, Inc. ("We") are committed to protecting and respecting your privacy.

This policy describes how Brightwell Payments collects and uses your personal information that we obtain when you visit or use our website in the European Union ("EU") or European Economic Area ("EEA").

This Privacy Policy together with our Brightwell Navigator Terms of Use and any other documents referred to on it sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting and using the Brightwell Navigator website <https://www.brightwellnavigator.com> you are accepting and consenting to the practices described in this policy including the transfer of your personal data outside of the EU/EEA to other countries including the United States.

By "your data", "your personal data", and "your information" we mean any information about you, including bank account details, which you or third parties provide to us.

### INFORMATION WE MAY COLLECT FROM YOU

We may collect and process the following data about you:

- **Information you give us.**
  - You may give us information about you by filling in forms on our site <https://www.brightwellnavigator.com/> ("**our site**") or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you enroll to use our site and the Brightwell Navigator Service, select how you want distributed your salary, wages, tips, commissions and other forms of employment/contractor related compensation to be paid to you by your employer/contractee ("**Salary/Wage**"), enroll an OceanPay Card, input or modify beneficiary bank account details and allocate how much of your salary/wage go to each account and when you report a problem with our site. The information you give us may include your name, date of birth, bank account information, employee identification number, passport number and details, mailing address, e-mail address and phone number, OceanPay Card information and bank account details.
  - Where you provide personal information relating to others (e.g. dependants, joint account holders) for the purpose of Salary/Wage disbursements facilitated via the Brightwell Navigator Service you confirm that you have their consent or are otherwise entitled to provide this information to us and for us to use it in accordance with this agreement.

- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
  - technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.**
  - We may receive information about you if you use any of the other websites we operate or the other services we provide, including, without limitation, in relation to your OceanPay Card. Such data may be shared internally and combined with data collected on this site. We are also working closely with third parties, in particular your employer/contractee but also including, for example, business partners, sub-contractors in technical and payment services, advertising networks, analytics providers, credit reference agencies and fraud prevention agencies) and may receive information about you from them.
  - The information we will receive from your employer/contractee will include, without limitation, information to assist with your enrollment for and continued participation in the Brightwell Navigator Service and details of salary, wages, tips, commissions and other forms of employment/contractor related compensation to be paid to you by your employer/contractee to enable the method(s) and amount per method of disbursement of such payments to be selected via the Brightwell Navigator Service.

## **COOKIES**

When you access our website to use the Brightwell Navigator service, we may place small data files called “cookies” on your computer or other device. Cookies are used to facilitate your Internet session, to maintain security and to improve the user experience. You may decline our cookies if your browser permits, however, declination may interfere with your use of our website and the Brightwell Navigator service.

## **USES MADE OF THE INFORMATION**

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:

- to carry out our obligations to your employer/contractee who has contracted with us for the provision of the Brightwell Navigator Service for use by you;
  - to carry out our obligations to you (as set out in the Brightwell Navigator Terms of User) and to provide you with the information, products and services that you request from or via us;
  - to provide you with information about other goods and services we offer that are similar to those that you already use through us or have already acquired from or through us or which you have enquired about;
  - to provide you with information about goods or services provided by third parties we feel may interest you.
  - to notify you about changes to our service;
  - to ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
    - to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
    - to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
    - as part of our efforts to keep our site safe and secure;
    - to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
    - to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
  - **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

#### **DISCLOSURE OF YOUR INFORMATION**

We may share your personal information with any member of our group, which means our subsidiaries, our ultimate holding company and its subsidiaries.

We may also share your information with selected third parties including:

- Your employer/contractee, business partners, suppliers and sub-contractors for the performance of any contract we have entered or enter into with them and/or for the performance of our obligations to you as set out in the Brightwell

Navigator Terms of Use. In particular, we will share your information with: (i) your employer/contractee to enable use of the Brightwell Navigator Service by you; (ii) the Issuer in connection with your OceanPay Card account; and (as applicable) (iii) the Remitter to facilitate the provision of the Remitter Service to you (as described in the Brightwell Navigator Terms of Use).

- Analytics and search engine providers that assist us in the improvement and optimisation of our site.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If Brightwell Payments, Inc. or substantially all of its assets are acquired by a third party, in which case personal data held by it about its customers/users of the Brightwell Navigator Service will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply the Brightwell Navigator Terms of Use and other agreements; or to protect the rights, property, or safety of Brightwell Payments, Inc., our customers/service users, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and risk reduction.

#### **WHERE WE STORE YOUR PERSONAL DATA**

The data that we collect from you will be transferred to, and stored in the United States of America. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers and will be will be encrypted [using SSL technology]. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we protect your personal data using physical, technical and administrative security measures, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to prevent loss, misuse and unauthorized access.

Brightwell Payments is committed to adequately protecting your information regardless of where the data resides and to providing appropriate protection for your information where such data is transferred outside of the EU/EEA.

## **FURTHER USE AND RETENTION OF YOUR INFORMATION**

Other than as specified herein, we will keep information about you confidential unless we have a duty to disclose it or law or regulation allows us to do so for legitimate business purposes. We will retain information about you after you have terminated your use of the Brightwell Navigator Service, or if your enrollment is declined or abandoned, for as long as permitted or required for legal, regulatory, fraud and other financial crime prevention purposes and for lawful permitted business purposes.

## **YOUR RIGHTS**

You will always have the ability to opt out of any promotional contact or usage of your personal data for promotional purposes. Your information will not be given or sold to any outside organization/third party for use in marketing without your consent. Where you have provided specific consent, communications may include promotions from relevant third parties. You may tell us at any time if you do not wish to receive marketing communications from us and/or third parties online by responding to the marketing communication, using your online account, submitting an OceanPay support ticket or by contacting us at the toll-free number on the back of your OceanPay Card and advising us of the types of communication that you no longer wish to receive.

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates, including, without limitation of the Issuer (in connection with your OceanPay Card) and (as applicable) the Remitter (in connection with the Remitter Services). If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **ACCESS TO INFORMATION**

You are entitled to see the information held about you by us and you may ask us to make any necessary changes to ensure that it is accurate and kept up to date. If you wish to do this, please contact us using your online account, submitting an OceanPay support ticket or by contacting us at the toll-free number on the back of your OceanPay Card. You can request the deletion of any of your personal data. Upon such request, we will delete or suspend access to such data to the extent permitted by law. You can request any changes or deletion of your personal data kept by us by contacting us as set out in the "Contact" section below.

### **CHANGES TO OUR PRIVACY POLICY**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, you will be notified through your online account or by e-mail. Please check back regularly to see any updates or changes to our privacy policy.

### **CONTACT**

To exercise your right to access your information or for questions regarding this privacy policy or Brightwell's information practices, contact us using the Navigator online account message option or by writing to us at Brightwell Payments, P.O. Box 724026, Atlanta, GA 31139 USA.