

Apto Payments Corporate Privacy Notice

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Introduction

Apto Payments Inc. (“Apto,” “we,” or “us”) understands and respects the need for privacy. This Privacy Notice (“Notice”) describes our practices related to the information we collect about our prospective, current, and former clients who visit aptopayments.com, use our developer portal, or visit other websites or applications we may offer that link to this Notice (collectively, the “Sites”).

If you would like to learn about the information we collect about end users of the services we provide to Apto clients, please visit the [Apto Payments Services Privacy Notice](#).

What This Notice Contains

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1. About Apto Products and Services

Apto, formerly Shift Payments, was founded in 2014. Apto is a full stack digital card platform that includes program management and user on-boarding. Apto provides a white-label, business-to-business (“B2B”) solution, allowing our clients to easily issue cards to their end users without independently integrating with issuing banks, processors, card printing facilities, or cardholder screening and authorization providers.

2. Information We Collect About You

To operate and improve our Sites, Apto collects certain information about you. Sometimes, we receive information directly from you, such as when you sign up for an Apto account or request information from us. In other cases, we may automatically collect information about you through your use of our Sites.

A. Information You Provide

When interacting with us or using our Sites, you may voluntarily provide information about yourself, including your name, contact information, affiliated company information, log-in information, and any

other information you choose to provide. For example, we collect this information when you register for an Apto account through our developer portal, contact us, or interact with us for any other purpose.

When you apply to become an Apto customer, we will ask you to provide additional personal information to meet our compliance requirements. The information we collect typically includes:

- Identity verification information, such as your birthdate, social security/tax identification number, driver license details, passport/visa details, and national identity cards; and
- Other verification information, such as lease information for your affiliated company, bank statements, and utility bills.

Additionally, you may provide information to us about third parties, such as individuals who have ownership interests in your affiliated company.

Apto may also collect information about you and third parties from other sources and combine this with information we have collected directly from you.

B. Information We Collect Automatically

We (and other entities) automatically collect information relating to your interactions with us and our Sites, including browser type, IP address, pages visited and other activities on the Sites, device type, and time and date of visit, and other information we collect through the use of cookies and similar technology. See the [Digital Advertising and Analytics](#) section of this Notice to learn more about the use of this information and the choices available to you.

3. How We Use Information

The information that Apto collects about you is primarily intended to facilitate account access and provide smooth functionality of our services, such as to:

- Provide, secure, and improve our Sites and services – For example, we use information to provide and analyze how you use our Sites and services, develop new products and services, maintain the security of our Sites and services, and improve functionality, quality, and your experience. This includes using aggregated or deidentified data to improve our Sites and services.
- Communicate with you – For example, Apto may contact you to respond to your inquiries and requests, or to send important notices. We may also send updates, promotions, and marketing materials that may be of interest to you. See the [Your Choices](#) section of this Notice to learn how to manage your communication preferences.
- Fulfill our compliance and legal obligations – For example, Apto may use information we collect about you in connection with our financial regulatory obligations.
- Other – Apto may use information we collect in other ways as disclosed at the point of collection or with your consent.

4. How We Share Information

We share the information we collect about you in various ways, including the ways described below:

- With Service Providers – We may share information with service providers acting on our behalf, such as service providers that help us operate the Site and help us with our business activities, products, and services. These companies may use this information to provide these services or perform them on our behalf.
- With our Banking Partners – We may share information with our banking partners to provide our services. How our banking partners use such information will be governed by agreements we have with them, as well as their own privacy policies.
- With Affiliates – We may share information with any affiliates or joint venture partners that we have now or may have in the future.
- In Connection with Mergers or Acquisitions – We may share information in connection with an actual or potential transfer of some or all our assets.
- For Legal Purposes – We may share information when disclosure is appropriate (1) to comply with any applicable law, regulation, subpoena, legal process, or governmental request; (2) to enforce our legal rights, including our Terms and Conditions and for investigating potential violations of applicable terms; or (3) to protect against harm to the rights, property, or safety of Apto, you, or the public as required or permitted by law.
- With Consent – We may share information with other third parties with your consent.

5. How We Protect Your Information

Apto takes steps to protect your information from unauthorized use, access, loss, misuse, alteration, or destruction.

Notwithstanding our security safeguards, it is impossible to guarantee absolute security in all situations. For example, the transmission of information over the Internet using personal computers or mobile devices is not completely safe, and therefore, Apto cannot guarantee the security of information submitted to our platform. Any transmission of information is at your own risk.

If you have questions about security of our Sites, please contact us at the email or address listed in the [Contact Us](#) section.

6. Digital Advertising and Analytics

When you visit our Sites, we may partner with ad networks and other ad serving providers (“Advertising Providers”) that serve ads on behalf of us and others on non-affiliated sites and apps. Some of those ads may be personalized, meaning that they are intended to be more relevant based on information Advertising Providers collect about your use of our Sites and other sites or apps over time, including

information about relationships among different browsers and devices. This type of advertising is known as interest-based advertising. In particular, Apto uses Advertising Providers to show Apto advertisements to individuals who previously visited our Sites.

You may visit the DAA Webchoices tool at www.aboutads.info to learn more about this type of advertising and how to opt out of this advertising on websites by companies participating in the DAA self-regulatory program. If you delete your cookies or use a different browser or mobile device, you may need to renew your opt-out choices exercised through the DAA Webchoices tool. Note that electing to opt out will not stop advertising from appearing in your browser or applications. It may make the ads you see less relevant to your interests.

We may also work with third parties that collect data about your use of the Sites and other sites or apps over time for non-advertising purposes. Apto uses Google Analytics and other third-party services to improve the performance of the Sites and for analytics and marketing purposes. For more information about how Google Analytics collects and uses data when you use our Sites, visit www.google.com/policies/privacy/partners, and to opt out of Google Analytics, visit tools.google.com/dlpage/gaoptout.

Additionally, your browser may offer tools to limit the use of cookies or to delete cookies; however, if you use these tools, our Sites may not function as intended.

7. Third-Party Services, Applications, and Websites

The Sites may provide links to third-party websites or apps. We do not control the privacy practices of those websites or apps, and they are not covered by this Notice. You should review the privacy policies of other websites or apps that you use to learn about their information practices.

The Sites also include integrated social media tools or “plug-ins,” such as social networking tools offered by third parties. If you use these tools to share personal information or you otherwise interact with these features on the Sites, those companies may collect information about you and may use and share such information in accordance with your account settings, including by sharing such information with the general public.

Your interactions with third-party companies and your use of their features are governed by the privacy policies of the companies that provide those features. We encourage you to carefully read the privacy policies of any accounts you create and use.

8. Your Choices

You have choices related to how Apto uses your information and communicates with you. For instance, you may opt out of receiving marketing emails from us by unsubscribing from such messages. Note that if you unsubscribe, we may continue to send you emails related to your use of our Sites and services.

9. Changes to This Privacy Notice

We periodically update this Notice to describe new features, products, or services, and how those changes affect our use of your information. We encourage you to review this Notice for updates periodically.

10. Contact Us

If you have questions about this Notice or our information handling practices, please contact us at support@aptopayments.com or write to us at Apto Payments Inc., 717 Market Street, Suite 100, San Francisco, CA 94103. You can also make use of our [contact form](#).