

Apto Payments Services 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 clients’ end users (“Cardholders”). Our clients (“Clients”) are businesses that use our services to provide financial services, such as issuing payment cards to their Cardholders. Apto collects information about our Clients’ Cardholders solely on behalf of our Clients, and the Cardholders of our Clients are not Apto’s Clients or customers.

In this Notice, we refer to our Clients’ Cardholders as “you.” While Apto collects information about you only on behalf of our Clients, we provide this Notice to describe the information that we collect, the purposes for which it is used, and how it is shared.

If you would like to learn about the information we collect about Apto Clients including through the Apto website and developer portal, please visit the [Apto Payments Corporate 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 Cardholders without independently integrating with issuing banks, processors, card printing facilities, or cardholder screening and authorization providers.

2. **Information We Collect About You**

To provide our services to Clients, Apto collects certain information about you. Sometimes, we receive information about you from our Clients or through your applications for products provided by our Clients, such as when you sign up for an account with one of our Clients. In other cases, we may automatically collect information about you through your use of our services.

A. Information Provided to Us

Apto receives information about you when you apply for financial services provided by our Clients that rely on Apto's Services. This helps our Clients provide their financial services in a more efficient manner, for example to issue cards to you without independently integrating with issuing banks, processors, card printing facilities, or cardholder screening and authorization providers. This information is necessary for us to fulfill "Know Your Customer" ("KYC") compliance requirements and otherwise provide our services.

In connection with the KYC identification process and our services, we may collect the following information about you:

- Account information – Name, date of birth, address, email address, phone number;
- Identity verification information – Social security/tax identification number, driver license details, passport/visa details, national identity cards; and
- Address verification information – Bank statements, and/or utility bills.

Typically, you may provide this information to our Client during the account registration process. We may also collect any information that you provide to us during customer support interactions, when we provide you with support on behalf of our Clients.

Apto also collects information about you from other sources, including from third-party partners to enhance our services. For example, we use analytics providers to help us understand how you are navigating our services, so we can improve your experience and for other purposes like security. We may also receive information about you from the financial institution that issues your card.

B. Information We Collect Automatically

When you use services we provide to our Clients, we may automatically collect information about you, including transaction and technical information.

Apto collects transaction information when you make purchases using our Clients' cards. The information that we collect may include, but is not limited to, the merchant name, the purchase amount, and date of purchase. Apto also collects technical information relating to your activities on Apto services, including analytics information, device identifiers, and IP addresses. As explained in the below "How We Use Information" section, the information we collect automatically is necessary for business purposes such as providing our services, resolving customer issues, maintaining the security of our services, and conducting internal research to understand how customers interact with our services. The information may also be necessary to fulfill our legal requirements.

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. For instance, we use your information to:

- Verify your identity – Apto may use information we receive about you to verify your identity, consistent with KYC requirements.

- Communicate with you – For example, Apto may contact you to respond to your inquiries, requests, and/or send important notices. This includes, for example, transaction confirmation, requests for additional information for legal compliance, and changes to cardholder agreements.
- Provide, secure, and improve our services – For instance, we use information to provide and analyze how you use our services, develop new products and services, maintain the security of our services, and improve functionality, quality, and your experience. This includes using aggregated or deidentified data to improve our services.
- Fulfill our compliance and legal obligations – For instance, Apto processes information about you and your transactions when you use our Clients’ cards to make purchases, as required by law.
- 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 do not sell information about you to advertisers or other third parties for their own use. However, we may share information we collect about you in various ways to deliver our services, including the ways described below:

- Clients – Apto may provide information we collect about you with our Clients for the purpose of providing our services to them.
- Card issuers – Apto may provide information we collect about you to financial institutions to issue and service your card(s).
- Service providers – We provide your information to other third parties acting on our behalf that help us with our business activities, products, and services, such as with companies that print and ship your card. These companies may use your information to provide these services or perform them on our behalf.
- Other third parties – Apto may share information about you with other third parties as described below:
 - Consent provided: We may share information with your consent.
 - Mergers and acquisitions: We may share information we collect in connection with an actual or potential transfer of our assets. If your personal information is transferred to a party unaffiliated with Apto as part of merger, acquisition, or sale of all or a portion of our assets, we will provide you with notice about Apto’s arrangement with the new entity through Apto’s website.
 - Legal purposes: We may disclose your information when disclosure is appropriate (1) to comply with any applicable law, regulation, subpoena, legal process, or enforceable 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.

5. Privacy Rights

Certain jurisdictions provide privacy rights to residents or other individuals by law. Apto is not required to provide you with such rights because we process information about you on behalf of our Clients. We encourage you to visit our Clients’ privacy policies to learn what rights might be available to you.

6. 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 services, please contact us at the email or address listed in the [Contact Us](#) section.

7. Third-Party Services, Applications, and Websites

When you use our Clients' services and the services of the institution issuing your card, they may have separate terms and privacy policies that apply to the information they collect about you. Apto does not control our Clients' or card issuers' privacy practices, and they are not covered by this Notice. You should review the privacy policies of services you use that you use to learn about their information practices.

Additionally, the services we provide may link to certain third-party services, websites, or applications. These services, websites, or applications may also have separate terms and privacy policies independent of this Notice. We are not responsible for the privacy practices of these third-party services or applications. We recommend carefully reviewing the terms and privacy statement of each third-party service, website, and/or application before use.

8. 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.

9. 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](#).