

## EDENRED COMMUTER BENEFITS SOLUTIONS, LLC PRIVACY POLICY

Updated: April 2017

This Privacy Policy (this “Privacy Policy”) applies to Edenred Commuter Benefits Solutions, LLC, (the “Company”) online interface (i.e., website or mobile application) and any Edenred Commuter Benefit Solutions, LLC affiliate or subsidiary online interface that links to this Privacy Policy, (each, a Site, and, collectively, Sites). The purpose of this privacy policy is to provide you with a description of the types of information you provided to or collected by Edenred Commuter Benefits Solutions, LLC on its website (the “Sites”) and Mobile Applications, in connection with the Services provided by the Company (as described below). As used herein, the terms “you”, “your” and “user” refer to all persons and entities accessing the Site and Mobile Applications on your behalf for any reason and the terms “we” and “us” refer to the Company.

The Site and Mobile Application works with you, your employer and/or Commuter Benefits provider, as well as certain other third parties described herein, to offer a commuter benefits program available under the IRS section 132 regulation (the “Services”).

### **1. Information Collection**

#### **• Information Provided by your Employer and Commuter Benefits provider**

You have been invited to access the Site or Mobile Application because your Employer and/or Commuter Benefits provider has elected to take part in a program that extends the Services to you. To begin your enrollment process, your Employer and /or Commuter Benefits provider has provided certain personally identifiable information about you, including your first and last name, home or office address, e-mail address and telephone or mobile number (collectively, your “Account Information”). We collect and store your Account Information for billing purposes and to verify your identity, to contact you regarding your user account, and to periodically notify you of activities with respect to the Services.

#### **• Information Provided by You**

We also collect and store information that you voluntarily provide to us as well as data related to your Site and Mobile Application visit and usage. You can use the Services to modify or confirm your user profile, and order or manage products and services offered. In establishing your user profile and for availing certain products/services you choose, you agree to provide us with additional data, including your age, date of birth, telephone or mobile phone number, email address, home address, credit card information, bank account information, (your “User Profile Information”). Certain functions of the Site and Mobile Application allow you to upload, submit, disclose, or offer information, content or material (your “Materials”). The Company may also collect other data regarding your use of the Site and Mobile Application, such as click-stream data, your IP address, access times and the referring website addresses (for additional information, see the section titled “Cookies” below). In addition, through your use of the Mobile Application we may collect geolocation data.

#### **• Information Provided by Third Parties**

You can choose to order products under the Services that are provided by a third party affiliate. The third party affiliate may provide information about the use of the product. Depending on the product choice and the affiliate, the third party may transmit your information back to us about the use of the product such as transaction dates and

## EDENRED COMMUTER BENEFITS SOLUTIONS, LLC PRIVACY POLICY

Updated: April 2017

times, locations of transactions and/or balances. Information provided to the third party is information you are authorizing us to transmit through the use of the Services.

Your Account Information and User Profile Information are collectively referred to as your “Information.”

### **2. Modifications and Changes**

We provide an easy way via an online account profile for you to access, correct, update or remove Information that has previously been provided to us. You can review your Information and make any necessary changes at any time, by logging into your user account. In addition, your Employer or Commuter Benefits provider, as applicable, may provide updated Account Information for you from time to time. If you are unable to edit your Information by logging into your user account, please contact us for assistance.

### **3. Use and Disclosure of Information Collected on this Site or Mobile Application**

We use your Information to facilitate the Services. This includes responding to inquiries or service requests, providing information about and marketing our products and the Services, resolving problems with your user account, such as access issues, to process and manage products and services and managing Site and Mobile Application access and use of the Services.

As part of the Services, some users will qualify to participate in reward programs by supplying account information for certain retailer loyalty programs. If you choose to participate, your Account Information will be used for purposes of calculating rewards and mailing or e-mailing coupons or pre-paid rewards cards to you.

The Company will not sell, share or rent your Information to third parties who are not affiliates of the Company except that certain aggregated information that does not permit direct association with you (not linked to any of your personally identifiable individual) may be used by the Company for other business purposes and may be shared with third parties. In addition, the Company may share your Information and Materials with entities with whom it has contracted to provide aspects of the Services or who otherwise perform functions on behalf of the Company to provide the Services, such as its Internet hosting provider. The Company may also use your Information to send you additional information on products and services offered by the Company or related information from third parties.

We reserve the right to disclose Information that we believe is appropriate to cooperate in investigations of fraud or other illegal or inappropriate activity or in response to a subpoena or other legal process. For example, this means that if we conduct a fraud investigation and conclude that one side has engaged in deceptive practices, we can give that person or entity’s contact information to victims who request it. If a subpoena seeks information about you, we’ll make reasonable business efforts to contact you before providing information to the party that requests it, but we cannot guarantee that we will be able to do so.

We may disclose information to your agent or legal representative (such as the holder of a power of attorney that you grant, or a guardian appointed for you). In addition, if you opt for direct deposits of your claim reimbursements in your bank account, we will share certain personal information with financial institution in order to arrange for the deposits.

## EDENRED COMMUTER BENEFITS SOLUTIONS, LLC PRIVACY POLICY

Updated: April 2017

As with any other business, it is possible that in the future we could merge with or be acquired by another company. If such an acquisition occurs, the successor company would have access to the information maintained by us, including customer account information, but would continue to be bound by this Policy unless and until it is amended.

### **4. Protection of your Information**

We are committed to protecting the security of the personal information you provide to us via the Site or Mobile Application. The Company has implemented reasonable technical and organizational measures designed to deter unauthorized access, destruction, use, modification, or disclosure of individually identifiable information. Regardless of the precautions taken by us or by you, no data transmitted over the Internet or any other public network cannot be guaranteed to be 100% secure. We cannot ensure or warrant the security of any information you transmit to us and you provide all individually identifiable information via the Site and Mobile Application at your own risk.

You are responsible for maintaining the security of your User Profile Information, including your password and for any and all activities that occur under your account. Do not share this information with anyone. We will never ask you to send your password or other sensitive information to us in an email, though we may ask you to enter this type of information on the Site and Mobile Application. If you are sharing a computer or device with anyone you should always log out before leaving a Site, Mobile Application or service to protect access to your personal information from subsequent users. The security of your use of the Mobile Application relies on your protection of your mobile device. You may not share your instance of the Mobile Application with anyone.

Any email or other communication purporting to be from us requesting your password or asking you to provide sensitive account information via email, should be treated as unauthorized and suspicious and should be reported to us immediately by emailing [customerservice@commuterbenefits.com](mailto:customerservice@commuterbenefits.com). If you believe someone else has obtained access to your password, please change it immediately by [creating a new password on your log in page or on your personal profile page] and report it immediately by emailing [customerservice@commuterbenefits.com](mailto:customerservice@commuterbenefits.com)

### **5. Choice and Opt-Out; Surveys and Other Information Gathering Activities**

You may “opt-in” to having your Information used for purpose of receiving marketing material from us or our affiliates.

If you no longer wish to receive our newsletter and promotional communications, you may opt-out of receiving them by following the instructions included in each communication. Please understand that if you choose not to receive promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us.

From time to time, we may provide you the opportunity to participate in Company surveys and other information gathering activities to obtain information regarding the use of and possible changes to the Company’s Services or the Site or Mobile Application and the attractiveness of additional Company service features or new products or services. Participation in these surveys and activities is completely voluntary and you will usually be provided a choice to participate anonymously. Information obtained from such activities may be used by us to consider

## **EDENRED COMMUTER BENEFITS SOLUTIONS, LLC PRIVACY POLICY**

Updated: April 2017

enhancements or improvements to the Services, for future product development or for other purposes pertaining to the Services or the Company's business.

### **6. Links to Other Websites**

The Site and Mobile Application may contain links to other third party websites over which the Company has no control. The Company is not responsible for the privacy policies or practices of other websites to which you choose to link from the Company website and the Company shall not be responsible for compliance with such policies or practices. You should review the privacy policies of those other websites so you can understand how they collect, use, share and protect any information that you choose to provide. This Privacy Policy applies solely to the information collected on this Site and Mobile Application and does not apply to any information collected by linked websites or the use of any your information by any third party through such linked websites.

### **7. Cookies**

"Cookies" are simple text files stored on your computer for use by a browser. Certain Site features may only be available through the placement of a cookie. We may use "cookies" to assist in data collection and to track visitor Site usage and trends to help us better serve you. The use of cookies is a standard practice among Internet web sites; most Internet browsers permit a user to accept, decline or delete cookies. This Site works with a first party cookie that collects anonymous traffic data at the Site. We use persistent cookies to make it easier for you to navigate the Site. Specifically, we use persistent cookies to track whether you are logged into the Site. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file. We use cookies to compile aggregate data about site traffic and site interaction so that we can offer better site experiences and tools in the future. We set a persistent cookie to store how you came to the Site and what part of the Services you use. We may contract with third-party service providers to assist us in better understanding our site visitors. These service providers are not permitted to use the information collected on our behalf except to help us conduct and improve our business.

### **8. Do Not Track.**

Certain browsers have a "do not track" feature that allows you to tell websites or applications that you do not want to have your online activities tracked. Please consult the "Help" section of your browser for more information. At this time, we do not respond to browser "do not track" signals. Please know that certain areas and features of our Site may be affected by turning off Tracking Technologies and you should be aware that disabling cookies or similar devices might prevent you from accessing some of our content or experiencing certain features as designed.

### **9. Children Under 13**

The Site and Mobile Application is not intended for children under 13 years of age and the Company does not knowingly collect personal information from children under 13 without the consent of a parent or guardian. We request that all visits under 13 to the Site and Mobile Application not disclose or provide any personally identifiable information. Upon notification that a child under 13 has provided us with personally identifiable information, we will delete the child's personally identifiable information from our records.

Updated: April 2017

### **10. Effective Date; Changes to Privacy Policy**

Each time you use the Site and Mobile Application, the current version of this Privacy Policy will apply. When you use the Site and Mobile Application, you should check the date of this Privacy Policy (which appears at the top of this Privacy Policy) and review any changes since the last version. Users can always refuse to accept the change to our privacy policy by terminating their use of the Services. Unless stated otherwise, our current Privacy Policy applies to all Information that we have about you. Continuation of such use shall be considered acceptance of the change in the privacy policy. We will not materially change our policies and practices to make them less protective of your privacy without the consent of affected users.

### **11. Governing Law**

This Privacy Policy is governed by the laws of the Commonwealth of Massachusetts, U.S.A. without giving effect to any principles of conflict of law.

### **12. Notice to California Residents**

If you are a California resident, California Civil Code Section 1798.83 permits you to request information regarding the disclosure of your personal information by the Company to third parties for the third parties' direct marketing purposes. With respect to these entities, this Privacy Policy applies only to their activities within the State of California. To make such a request, please send an email to [customerservice@commuterbenefits.com](mailto:customerservice@commuterbenefits.com) or write to us at the address listed below.

In addition, if you are a California resident under the age of 18 and are a registered user, you may request us to remove content or information posted on our Sites or stored on our servers by (a) submitting a request in writing to via the contact information listed at the end of this policy and (b) clearly identifying the content or information you wish to have removed and providing sufficient information to allow us to locate the content or information to be removed. However, please note that we are not required to erase or otherwise eliminate content or information if (i) other state or federal laws require us or a third party to maintain the content or information; (ii) the content or information was posed, stored, or republished by another user; (iii) the content or information is anonymized so that the minor cannot be individually identified; (iv) the minor does not follow the instructions posted in this Privacy Policy on how to request removal of such content or information; and (v) the minor has received compensation or other consideration for providing the content. Further, nothing in this provision shall be construed to limit the authority of a law enforcement agency to obtain such content or information.

### **13. Notice To Visitors Outside Of The United States.**

You should be aware that the United States and other countries have not harmonized their privacy regulations. Because the Company and its servers are located in the United States and our services are directed towards the United States market, our Privacy Policy has been prepared to comply with applicable United States regulations. By accessing and/or using the Site and Mobile Application and/or Services and providing personal information to us via the Site, you consent to the processing of your personal information as described in this Privacy Policy and you agree to the level of privacy protection set out in this Privacy Policy.

## **EDENRED COMMUTER BENEFITS SOLUTIONS, LLC PRIVACY POLICY**

Updated: April 2017

### **14. Notify Us**

If you have any questions or comments regarding the policy or if at any time you feel that we are not abiding by this privacy policy, you should contact us directly as follows:

Phone: (857) 228-1425

Fax: (857) 228-1414

Email: [customerservice@commuterbenefits.com](mailto:customerservice@commuterbenefits.com)

Postal Address: Edenred Commuter Benefits Solutions, LLC. 320 Nevada Street, Suite 401 Newton, MA 02460

All trademarks, service marks, and other proprietary materials herein are the property of Edenred Commuter Benefit Solutions, LLC and their respective owners. All rights reserved.