

## Viamerica's Privacy Statement

This Privacy Statement applies to information collected by Viamerica's Corporation, and its affiliates Viamerica's Money Services Corp., Viamerica's Financial Services Corporation, and Viamerica's New York Corporation (together "Viamerica's").

### Notice to California Residents

If you are a California resident, California law may provide you with additional rights regarding our use of your personal information. To learn more about our data collection practices and your California privacy rights, please see the [CCPA Privacy Notice](#) on page 6. For a copy of the [CCPA request webform](#), please see page 10.

| FACTS | WHAT DOES VIAMERICAS DO WITH YOUR PERSONAL INFORMATION?   |
|-------|---|
| Why?  | Financial companies choose how they share your personal information, whether you send money, receive money, or we otherwise collect information about you. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.  |
| What? | <p>The types of personal information we collect and share depend on the product or service you have with us. This information can include, without limitation:</p> <ul style="list-style-type: none"><li>▪ domestic and foreign-government identification numbers, such as driver's license, passport, visa, Social Security or tax identification number</li><li>▪ name, date of birth, address, email address, occupation, employer, mobile and home telephone number</li><li>▪ transaction history</li><li>▪ credit, debit, bank account and payment history information</li><li>▪ phone conversations and e-mail communications</li><li>▪ hardware and software identifiers, geolocation, browser type, internet service provider, referring/exit pages, operating system, IP address, and browsing history logs to obtain usage statistics and behavior patterns as well as other information from and about your device (such as device properties, settings, applications, stored information and usage) and carrier; the browser and operating system software you use; social profile and network information; the date and time you access our website and the Internet address used to link to our website when you visit us</li></ul> <p>You consent to our collection, transfer and storage of information by computers or other transfer or storage devices in the United States and elsewhere.</p> |

|       |   |
|-------|---|
| How?  | All financial companies need to share customers' and consumers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their customers' and consumers' personal information; the reasons Viamericas chooses to share; and whether you can limit this sharing. |
| When? | This privacy statement was last revised on January 1, 2020.   |

| Reasons we can share your personal information  | Does Viamericas share? | Can you limit this sharing? |
|---|------------------------|-----------------------------|
| <b>For our everyday business purposes</b> – such as to process your transactions; collect payment; detect and prevent fraud and other illegal activities; cooperate with criminal or government investigations; maintain your account(s); comply with court orders, subpoenas, and court orders and other lawful requests; report to credit bureaus; enhance your consumer experience; validate your creditworthiness or your identity; in the event Viamericas were to become involved in a merger, acquisition or any form of sale of some or all of its business; or as otherwise permitted or required by law | Yes                    | No                          |
| <b>For our marketing purposes</b> – to offer our proprietary products and services to you or send you marketing and promotional messages  | Yes                    | No                          |
| <b>For joint marketing with other financial companies</b> - to offer jointly marketed products and services to you or send you marketing and promotional messages   | Yes                    | No                          |
| <b>For our affiliates' everyday business purposes</b> – such as information about your transactions and experiences   | Yes                    | No                          |
| <b>For our affiliates' everyday business purposes</b> – such as information about your creditworthiness   | No                     | We don't share              |
| <b>For our affiliates to market to you</b>  | No                     | We don't share              |
| <b>For non-affiliates to market to you</b>  | No                     | We don't share              |

|            |  |
|------------|--|
| Questions? | Call 1-800-401-7626 or go to <a href="http://www.viamericas.com">www.viamericas.com</a> and click on the “ <a href="#">Contact Us</a> ” link |
|------------|--|

| Who we are                    |            |
|-------------------------------|------------|
| Who is providing this notice? | Viamericas |

| What we do   |   |
|--|---|
| How does Viamericas protect my personal information?                               | <p>Viamericas employs reasonable security measures to protect your personal information from unauthorized access and use. These measures can include physical, electronic and procedural safeguards such as computer safeguards and secured files and buildings. We also endeavor to limit personal information access to only employees, agents and representatives that need to know. Despite our efforts, third parties may unlawfully intercept or access your transmissions to us or may wrongly instruct you to disclose information to them by posing as Viamericas or by misinforming you about our services. Always use caution and good judgment when sending money and when using internet and mobile technologies.</p>  |
| How does Viamericas collect my personal information?                               | <p>We collect your personal information, for example, when you</p> <ul style="list-style-type: none"> <li>▪ configure a transaction, complete a payment or use or request other products or services from us</li> <li>▪ provide account information or otherwise give us your contact information</li> <li>▪ provide your government issued ID</li> <li>▪ use or visit our online sites, navigate through mobile apps providing our services (for example, to complete a transaction, manage your accounts, or provide your choices)</li> <li>▪ enter a Viamericas-sponsored or affiliated promotion or loyalty program</li> <li>▪ communicate with our customer representatives online, via phone or email</li> </ul> <p>We also collect your personal information indirectly from a variety of sources, including without limitation, public information repositories; computer systems; third party sources such as our business clients, government agencies and other suppliers of information; and consumer reporting agencies – all in compliance with and subject to the limitations of applicable law.</p> |
| Why can't I limit all sharing?   | <p>Federal law gives you the right to limit only</p> <ul style="list-style-type: none"> <li>▪ sharing for affiliates' everyday business purposes — information about your creditworthiness</li> <li>▪ affiliates from using your information to market to you</li> <li>▪ sharing for non-affiliates to market to you</li> </ul> <p>State laws and individual companies may give you additional rights to limit sharing. See below for more on your rights under state law.</p>  |
| What happens when I limit sharing for an account I hold jointly with someone else? | <p>Your choices will apply to everyone on your account.</p>   |

| Definitions            |   |
|------------------------|---|
| <b>Affiliates</b>      | Companies related by common ownership or control. They can be financial and nonfinancial companies.   |
| <b>Non-affiliates</b>  | <p>Companies not related by common ownership or control. They can be financial and nonfinancial companies.</p> <ul style="list-style-type: none"> <li>For example: Viamericas agents that offer our services; banks, credit card companies, and other financial companies or MSBs, including for joint marketing purposes; non-financial companies such as providers of services complementary to Viamericas' services or the locations that offer such services; government agencies; and any third parties that are necessary to process transactions that you have requested or authorized; and otherwise as permitted or required by law</li> </ul> |
| <b>Joint marketing</b> | <p>A formal agreement between non-affiliated financial companies that together market financial products or services to you.</p> <ul style="list-style-type: none"> <li>Our joint marketing partners include Viamericas retail agents and/or payout correspondents, and companies that provide products and services supplementary to Viamericas services or the locations that offer such services.</li> </ul>   |

| Other important information   |
|---|
| <p><b>SALE OF INFORMATION</b></p> <p>Viamericas does not currently “sell” or plan to “sell” personal information it collects. For purposes of this Privacy Statement, “sell” means the disclosure of personal information for monetary or other valuable consideration to another business or a third party for monetary or other valuable consideration. Note: The definition does not include, for example, the transfer of personal information as an asset that is part of a merger, bankruptcy, or other disposition of all or any portion of our business.</p> <p><b>STATE PRIVACY LAWS</b></p> <p>We will comply with state privacy laws to the extent they apply to Viamericas services.</p> <p><b>California:</b> In accordance with California law, we will not share information we collect about you with companies outside of Viamericas except as required or permitted by law. For example, we may share information to complete requested transactions.</p> <p><b>Nevada residents:</b> This notice is provided to you pursuant to state law. Nevada state privacy laws permit us to make marketing calls to existing customers, but if you prefer not to receive marketing calls, you may be placed on our internal opt-out list by calling us at 1-800-401-7626 or you may also contact the Nevada Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Ste 3900, Las Vegas, NV 89101; telephone 702-486-3132; email: <a href="mailto:BCPINFO@ag.state.nv.us">BCPINFO@ag.state.nv.us</a>.</p> |

**Texas residents:** If you have a complaint, first contact Viamericas Corporation, at 1-800-401-7626 and ask to speak to the Legal Department. If you still have an unresolved complaint regarding the company's money transmission or currency exchange activity, please direct your complaint to the Texas Department of Banking: 2601 North Lamar Boulevard, Austin, TX 78705-4294; 1-877-276-5554 (toll free); [www.dob.texas.gov](http://www.dob.texas.gov).

**Vermont residents:** In accordance with California law, we will not share information we collect about you with companies outside of Viamericas except as required or permitted by law. For example, we may share information to complete requested transactions.

#### **CHILDREN'S PRIVACY**

Our website is not directed at children under the age of 13. Viamericas will not knowingly collect personal information from children under the age of 13, without the consent of a parent or guardian.

#### **EXTERNAL WEBSITES**

Our website may be linked to or from third party websites. Viamericas is not responsible for the content or privacy practices of websites that are linked to or from our website.

#### **COOKIES**

Some of our web pages may contain "cookies", small data files which are sent to your web browser and stored on your computer or mobile device to, among other things, allow us to recognize you as a returning customer and log your browsing trends and remember your website preferences to make your experience more convenient and personal. Cookies may also be used for future analysis by us or third parties to analyze trends, optimize website use, and to learn more about customer preferences which altogether help us improve our products and services. You may configure your web browser to not accept cookies or to notify you if a cookie is sent to you. Disabling cookies may limit functionality of our websites and/or applications and may also affect service levels.

#### **ONLINE ACTIVITIES**

We do not honor any Web browser "do not track" signals or other mechanisms that provide you the ability to exercise choice regarding the collection of personally identifiable information about your online activities over time and across third-party websites or online services. In addition, other parties may collect personally identifiable information about your online activities over time and across different websites when you use our website or any of our services.

#### **CHANGES**

Viamericas reserves the right to amend this privacy statement at any time. To the extent required by applicable law, we will notify you and give you the opportunity to opt out of any material change in the way we use or disclose personal information you previously have provided. You can get an updated Privacy Statement by calling us at 1-800-401-7626 or by visiting our website at [www.viamericas.com](http://www.viamericas.com).

# CALIFORNIA RESIDENT ADDENDUM TO THE PRIVACY STATEMENT AND DISCLOSURE REQUEST WEBFORM

*Effective January 1, 2020*

This California Resident Addendum to the Viamericas Privacy Statement (“Addendum”) is applicable to residents of California and is intended to address the requirements of the California Consumer Privacy Act of 2018 (“CCPA”).

We collect consumers’ personal information as permitted by applicable laws and regulations (including but not limited to the Graham Leach Bliley Act). The Categories of Personal Information described below are subject to the CCPA. For more information about the personal information that may have been collected about you, please review our Privacy Statement.

**Viamericas does not sell customers’ personal information to third parties.**

## COLLECTION OF PERSONAL INFORMATION

In Section 1 below, we provide the Categories of Personal Information that we may have collected from the indicated Sources in the 12 months prior. The information may have been shared with the described Third Parties for the specified Business Purposes. In Section 2 below, we provide additional information regarding the terms used in Section 1.

### Section 1

#### Category of Personal Information

- a. **Identifiers.** Such as, name, alias, postal address, email address, phone number, fax number, account name, Social Security number, driver's license number, passport number, unique personal identifier, IP address, device identifier.
  - i. Sources: Information provided by individuals; information we automatically collect from site visitors; information we may receive from third-party partners.
  - ii. Business Purposes: Auditing relating to transactions; security detection, protection and enforcement; functionality debugging / error repair; performing services for you; internal research and development; quality control; ad customization.
  - iii. Third Parties: Service providers (such as payout partners, payment processors, shipping partners, employee benefits partners); affiliated companies; government regulators; law enforcement; strategically aligned businesses.
- b. **Sensitive Information.** Such as, name with financial account, medical, health, and health insurance information, username and password.
  - i. Source: Information provided by individuals; employment applications; employees.
  - ii. Business Purposes: Auditing relating to transactions; security detection, protection and enforcement; functionality debugging / error repair; performing services for you; internal research and development; quality control; ad customization.
  - iii. Third Parties: Service providers (such as payout partners, payment processors, shipping partners, employee benefits partners); affiliated companies; government regulators; law enforcement; strategically aligned businesses.

- c. **Commercial Information.** Such as, transaction history, services purchased, product preference.
  - i. Source: Information provided by individuals; information automatically collected from site visitors; information we may receive from third-party partners.
  - ii. Business Purposes: Auditing relating to transactions; security detection, protection and enforcement; functionality debugging / error repair; performing services for you; internal research and development; quality control, ad customization.
  - iii. Third Parties: Service providers (such as payout partners, payment processors, shipping partners, employee benefits partners); affiliated companies; government regulators; law enforcement; strategically aligned businesses.
- d. **Internet and Other Electronic Network Activity Information.** Such as, the host from which you access the Internet, information about your device (such as device properties, settings, applications, storage and usage information), mobile application, browser and operating system software, the date and time you access our websites and the address of the site from which you linked to our website when you visit us.
  - i. Source: Information automatically collected from our website or mobile application visitors.
  - ii. Business Purposes: Auditing relating to transactions; security detection, protection and enforcement; functionality debugging / error repair; performing services for you; internal research and development; quality control; ad customization.
  - iii. Third Parties: Service providers (such as payout partners, payment processors, shipping partners, employee benefits partners); affiliated companies; government regulators; law enforcement; strategically aligned businesses.
- e. **Geolocation.**
  - i. Source: Information automatically collected from our website or mobile application visitors.
  - ii. Business Purposes: Auditing relating to transactions; security detection, protection and enforcement; functionality debugging / error repair; performing services for you; internal research and development; quality control; ad customization.
  - iii. Third Parties: Service providers (such as payout partners, payment processors, shipping partners, employee benefits partners); affiliated companies; government regulators; law enforcement; strategically aligned businesses.
- f. **Professional, Educational or Employment Information.**
  - i. Source: Information provided by individuals; information received from third parties as part of the review of employee applications.
  - ii. Business Purposes: Auditing relating to transactions; security detection, protection and enforcement; functionality debugging / error repair; performing services for you; internal research and development; quality control; ad customization.
  - iii. Third Parties: Service providers (such as payout partners, payment processors, shipping partners, employee benefits partners); affiliated companies; government regulators; law enforcement; strategically aligned businesses.

## Section 2

Additional information regarding terms used in Section 1:

### a. Sources

- Information provided by individuals: we may collect information directly from you, or through providing customer support or consultation, including using email, postal mail, call centers or live chat;
- Information automatically collected from our website or mobile application visitors: we may collect information from you or your device through your use of our websites or mobile applications.
- Information received from third parties as part of the review of employee applications. We may collect data from third parties as part of our review of your application to verify information provided in the application.
- Information we may receive from third-party partners. We may receive information from third party partners such service providers or agents.

### b. Business Purposes

- Performing services for you, including to:
  - Administer or otherwise carry out our obligations in relation to any agreement to which we are a party;
  - Process or fulfilling orders and transactions;;
  - Provide customer service;
  - Assist in completing a transaction;
  - Track shipments;
  - Process payments;
  - Maintain or service accounts; and,
  - Verify your information.
- Auditing relating to transactions, including to:
  - Troubleshoot, enhance, test, or develop our website and mobile application; and,
  - Create products or services that may meet your needs
- Security detection, protection and enforcement, including to:
  - Protect you, our agents, and Viamericas malicious, deceptive, fraudulent, or illegal activity.
- Functionality debugging, error repair, including to:
  - Ensure the proper functioning of your account, our website, and the Viamericas platform; and,
  - Identify and repair errors that impair the intended functionality of our systems.
- Quality control, including to:
  - Monitor quality control; and,
  - Ensure compliance with our legal obligations, policies and procedures.

## SALE OF PERSONAL INFORMATION

Viamerica's does not sell your personal information to third parties.

## CALIFORNIA RESIDENT RIGHTS

California residents have the right to request twice in a 12-month period, the categories of personal information we have collected about you during the past 12 months and, for each category of personal information, the following information:

- the categories of sources from which we collected that information;
- our business or commercial purpose for collecting that information;
- the categories of third parties to whom that information was disclosed for a business purpose; and
- the business or commercial purpose for which we disclosed that information.

You also may have the right to request the deletion of the personal information we have collected from you. Please note, however, that personal information collected as part of a financial transaction request is safeguarded under the Gramm-Leach-Bliley Act (GLBA) and as such is not subject to deletion requests.

In order to make a disclosure request, California residents may contact us by:

1. Completing the webform (see Annex A) and emailing it to [ccpa@viamerica.com](mailto:ccpa@viamerica.com)
2. Calling our Privacy Hotline at 1-833 851 3277, or
3. Emailing us at [ccpa@viamerica.com](mailto:ccpa@viamerica.com).

You may designate an authorized agent to make a personal information request on your behalf. If you choose to designate an agent, you may be required to provide the authorized agent with written permission to make your request and verify your own identity directly with us. We may deny a request from an agent that does not submit proof that they have been authorized by you to act on your behalf.

You have the right not to be discriminated against because you exercise any right described in the Privacy Statement or this Addendum.

If you have previously transacted with Western Union, you have rights separate from those described above which are explained in the Privacy Statement.

## CONTACT

For questions or concerns about this Addendum, please contact Viamerica's Privacy Hotline at 1-833 851 3277 or email us at [ccpa@viamerica.com](mailto:ccpa@viamerica.com).

## Annex A – CCPA Webform

In order to submit a disclosure request to Viamericas, please complete and email this form to [CCPA@viamericas.com](mailto:CCPA@viamericas.com) so that we may process your request.

| CONSUMER INFORMATION  |                                       |
|---|---------------------------------------|
| FULL NAME   | PHONE NUMBER                          |
| ADDRESS   |                                       |
| EMAIL ADDRESS   |                                       |
| VIAMERICAS SERVICES USED (Check All Applicable)   |                                       |
| <input type="checkbox"/> Money Transfer   | <input type="checkbox"/> Top-Up       |
| <input type="checkbox"/> Money Order  | <input type="checkbox"/> Bill Payment |
| <input type="checkbox"/> Check Processing   |                                       |
| REQUEST   |                                       |
| <input type="checkbox"/> Categories of Personal Information Collected                     |                                       |
| <input type="checkbox"/> Categories of Personal Information Disclosed                     |                                       |
| <input type="checkbox"/> Specific Pieces of Personal Information Collected                |                                       |
| <input type="checkbox"/> Specific Pieces of Personal Information Disclosed                |                                       |
| <input type="checkbox"/> Deletion of Personal Information Collected                       |                                       |
| CONFIRMATION   CONFIRMACION   |                                       |
| By signing this form I confirm that the information provided herein is true and accurate. |                                       |
| Signature   | _____                                 |
| Name  | _____                                 |
| Date  | _____                                 |

### REPRESENTATIVES

Individuals acting as a representative of a California consumer must complete the top portion of this form along with the information requested below.

Representative's Full Name: \_\_\_\_\_  
Relationship to Consumer: \_\_\_\_\_  
Phone Number: \_\_\_\_\_  
Email Address: \_\_\_\_\_  
Physical Address: \_\_\_\_\_