

Privacy Policy

Last Updated: **September 12, 2022**

This Privacy Policy is provided by Appriza Pay Technologies, LLC. ("we," "us," "our," or "Appriza") and shall be incorporated by reference into our **Terms of Use**. By accessing or using the www.coppelaccess.com ("Website") or our mobile application(s) ("Apps"), you acknowledge that you accept the practices and policies outlined in this Privacy Policy.

What Does This Privacy Policy Cover?

This Privacy Policy covers Appriza's treatment of personal information not covered under the **Appriza GLBA Privacy Notice**, as described further below.

This policy does not apply to the practices of companies that Appriza does not own or control (including any third-party products or services used for logging into the Apps or our services or that are otherwise integrated with the Apps or our services), or to individuals that Appriza does not employ or manage.

Personal Information We Collect and Disclose

A. Collection: The only personal information we receive that is not subject to the GLBA Notice is analytics information relating to internet or network activity and geolocation. Examples include page views, clickthroughs, referral and exiting URLs, time spent on pages, latency, IP address, and the precise or generalized location of your device.

Note that we *may not* collect each element of personal information identified above in relation to each person who visits or uses our Website or Apps. The information we collect will depend on how you interact with us through our Website and Apps.

B. Sources: The above categories of personal information are collected from you directly when you visit or use our Website or Apps, or from server logs or 1st/3rd-party cookies, pixels or similar technologies.

C. Business Purposes: We use the above categories of personal information for the following business purposes:

- Responding to inquiries and other messages
- Providing marketing materials and emails of our own products and services or those of our third-party business partners
- Audience measurement and analytics (e.g., understanding of how the Website and Apps are used, the locations where you engage with the Website and Apps, engagement with social media and other marketing channels such as email, and measuring clickthroughs from URLs, where applicable)
- Providing location-specific services, where available
- Cybersecurity and fraud detection
- Compliance with applicable law

- Responding to lawful requests by public authorities
- Establishing, exercising or defending legal claims
- Optimizing the Website, Apps and related services
- A merger, dissolution, reorganization or similar corporate event, or the sale of all or substantially all of our assets (including, in each case, any due diligence relating thereto)
- Internal purposes aligned with consumer expectations
- As otherwise either disclosed to you (e.g., via “just-in-time” notices) or pursuant to your consent.

Note that each business purpose listed herein *may not* use every category of personal information described above. However, all information may be transferred in the context of a merger, sale or similar event, as such are further described above.

D. Disclosures: For the above business purposes, we may disclose each of the categories of personal information above to third parties and service providers such as cloud storage and web hosting providers, distributors, technical assistance and security vendors, database management/back-up services, analytics services, email clients, digital marketing services (e.g., marketing automation), customer relationship management/CRM platforms, and customer service vendors, as needed.

Access, Deletion and Updating Personal Information

If you have any questions about viewing or updating information we have on file about you, please contact us at ContactUs@CoppelAccess.com. California consumers have additional rights, set out in the CCPA Notice below.

Do Not Track

We currently do not honor “Do Not Track” or similar signals or headers.

CCPA Notice

This California Consumer Privacy Act (“CCPA”) privacy notice (this “CCPA Notice”) is part of our Privacy Policy and applies only to our processing of “personal information” of California “consumers” (as the terms “personal information” and “consumer” are defined under the CCPA) (collectively, “Consumers,” “you,” or “your”). Any capitalized terms not defined in the Privacy Policy shall have the meaning given to them in the CCPA. For clarity, personal information within the scope of our [GLBA Privacy Notice](#) is not subject to this CCPA Notice.

To the extent of any conflict between this CCPA Notice and the rest of our Privacy Policy, this CCPA Notice shall control only with respect to California Consumers and their personal information.

Your CCPA Rights

A. Access: You may request access to the personal information that we have collected and maintained about you (along with information regarding its use and disclosure) over the past

twelve (12) months upon appropriate verification. You may only make such requests twice per every twelve (12) months.

B. Deletion: You have the right to request that we delete personal information collected and maintained about you, subject to certain exceptions. Once your request is verified and we have determined that we are required to delete that information in accordance with applicable law, we will delete your personal information accordingly. Your request to delete your personal information may be denied if it is necessary for us to retain your information under one or more of the exceptions listed in the CCPA. Please note that a record of your deletion request may be kept pursuant to our legal obligations, as discussed below.

C. "Do Not Sell" Requests: We do not sell personal information within the meaning and scope of the CCPA.

D. Exercising Your Rights: To exercise the access and deletion rights described above, please submit a request to us by calling us at [TOLL-FREE NUMBER] or emailing [EMAIL ADDRESS] and including "CCPA Request" in the subject line of the email.

Consumers have a right not to receive discriminatory treatment for the exercise of their rights under the CCPA. Please note that a record of your requests, including how we responded, and any correspondence or documentation related thereto, may be kept pursuant to our legal obligations.

Verifying Your Rights Requests

Only you, or a person that you authorize to act on your behalf, may make a request related to your personal information. In the case of access and deletion, your request must be verified before we can fulfill such request.

Verifying your request will require you to provide sufficient information for us reasonably to verify that you are the person about whom we collected personal information, or a person authorized to act on your behalf (e.g., name, email address).

We will only use the personal information that you have provided in a verifiable request in order to verify your request. As stated above, we cannot respond to your request or provide you with personal information if we cannot verify your identity or authority.

Please note that we may charge a reasonable fee or refuse to act on a request if such request is excessive, repetitive, or manifestly unfounded.

How to Contact Us

If you have any questions regarding our privacy practices as it relates to this Privacy Policy (including the CCPA Notice), please contact us via email at DataPrivacy@CoppelAccess.com with the subject line, "Privacy Policy."

Changes to this Privacy Policy

If, in the future, we intend to use or disclose your personal information for a purpose other than that which it was collected, we will provide you with information on that purpose and any other relevant information at a reasonable time prior to that change. The "Last Updated" date at the top of the Privacy Policy indicates the date it was last amended.

Questions or Concerns

If you have any questions or concerns regarding privacy in connection with the Apps or our Website, please contact us at ContactUs@CoppelAccess.com.