LATERPAY PRIVACY POLICY

Effective date: July 9th, 2020

1. WHO WE ARE

Welcome to Laterpay, Inc. Laterpay facilitates digital payments across the internet (the “Laterpay service”). This Privacy Policy explains how we (“Laterpay,” “we,” “us” or “our”) collect, use, share and protect personal information in relation to our services, web site, and any software provided on or in connection with Laterpay, and your choices about the collection and use of your information. “Personal information” generally means any information relating to an identified or identifiable individual. When we refer to “information” or “your information” in this Policy, we are referring to personal information.

- You (“you” or “your”) are anyone who interacts with Laterpay via the internet, including a visitor to our website; an end user of the Laterpay service, whether or not you create a Laterpay account; or a content provider or recipient of donations or contributions who makes use of the Laterpay service (referred to in this document as a “merchant”).
- By using the Laterpay service, you are acknowledging you have read and accepted this Privacy Policy.

2. INFORMATION WE COLLECT

Depending on your use of the Laterpay service, we may collect several types of information.

Information you provide to us directly:

- Your first and last name, password, e-mail and in some cases mailing address, a reference number that can be associated with your payment details, your purchase history (if any) and login information, or any other information you provide directly when you register for a Laterpay account. When you sign up for our newsletter, we collect your name, e-mail, industry and company.
- Communications between you and Laterpay. For example, we may send you Laterpay service-related emails (e.g., account verification, changes/updates to features of Laterpay, technical and security notices). You may send us comments, questions or requests.
- Additional details related to your use of the Laterpay service, including a record of your agreement to Laterpay legal terms, term of subscription and renewal periods, contents of your shopping basket (if any), preferred billing method, user account details or credit card details or other terms of payment.

Information you provide to us indirectly:

Laterpay collects additional information from you while you interact with Laterpay systems.

Analytics information

- Laterpay uses analytics tools provided by Google Analytics (a service provided by Google, Inc.) and Hubspot, Inc. to help us measure traffic and usage trends both on our website and on our merchants’ websites. These tools collect information sent by your device or by our service to you, including the web pages you visit through Laterpay, add-ons, your anonymized IP address, and other information that assists us in gathering feedback to improve Laterpay and our business model. You can opt out of being included in Google Analytics by downloading and installing a plugin found here.

Cookies and similar technologies

- When you visit Laterpay, we may use cookies and similar technologies like pixels, web beacons, and local storage to collect information about how you use Laterpay and provide features to you. Cookies are small files that make it easier for you to use content from the providers that use Laterpay. Your Internet browser automatically receives these files from our servers and then saves the cookies on your computer. Laterpay uses what are known as session cookies and persistent cookies. We send several persistent cookies to your computer. Among other things, cookies allow you to access Internet content across different websites.
- You can change the settings on your browser so that it informs you when it accepts a cookie, or so that it does not accept any cookies at all. We recommend that your browser be set to accept cookies from Laterpay, as only then will you be able to use the Laterpay service.
- We may ask advertisers or other partners to serve ads or services to your devices, which may use cookies or similar technologies placed by us or the third party.

Log file information

- Log file information is automatically reported by your browser each time you make a request to access (i.e., visit) a web page or app. It can also be provided when the content of the webpage or app is downloaded to your browser or device.
- When you use Laterpay, our servers automatically record certain log file information, including your web request, IP address, browser type, referring / exit pages and URLs, number of clicks and how you interact with links on Laterpay, domain names, landing pages, pages viewed, and other such information. We may also collect similar information from emails sent to our users, which then help us track which emails are opened and which links are clicked by recipients. The information allows for more accurate reporting and improvement of the Laterpay service.

Browser fingerprint

- Your browser contains information about your browser version, program language, individually installed plug-ins (i.e., small programs or program extensions). The individual fingerprints are all different from one another, like human fingerprints. Browser providers or installed plugins can retrieve (or read out) this information in order to, for example, inform you when a new software is available to you. These “fingerprints” enable us to identify you when you are trying to make a purchase, restore your access to a previous purchase and merge anonymous invoices.
3. HOW WE USE YOUR INFORMATION

Depending on your use of the Laterpay service, we may use your information as described below.

To enable the Laterpay service:

- We use browser fingerprint information to recognize devices accessing Laterpay content. This allows us to know what content you have accessed and whether you have created an account, so that we can restore access to a previous purchase or link anonymous invoices to determine when you reach a payment threshold.
- We process your information, including your name, e-mail and mailing address, and payment information to manage our relationships with users and merchants and to carry out the transactions that you initiate when you use the Laterpay service as an account-holding user. We further review a range of information, including log files, IP addresses, mailing and e-mail addresses, and purchase information in order to improve the Laterpay product, trouble-shoot and track issues with the Laterpay platform, and identify areas for improvement.
- We use your personal information to communicate with you about the services we provide. For instance, for subscription service users, we use your contact information to notify you that your subscription will automatically be renewed soon or has expired. We use merchant contact information to provide you with customer support. We also use user and transaction data to handle support requests from users or merchants, including investigating an invoice or issuing a refund.
- In order to make sure our merchants get paid, we engage in a settlement process. During this process, our payment service provider consults user and merchant information, including name, amounts owed and currency information and makes net payments to our merchants.

To perform credit, identity and address checks:

- The success of our business depends on end users’ paying their bills and on our preventing illegal or fraudulent transactions. We compare usernames and country information against crime prevention watch lists upon registration. We also use username and country information to perform credit and money-laundering risk assessments for some transactions conducted using the Laterpay service.

To analyze user and merchant behavior:

- We perform statistical and other analysis of your activities related to Laterpay, including which digital content or other offerings you access, or are accessed on your site, at what times and frequency. We do this to gain a better understanding of how our services are used so that we can provide you with a better, more intuitive and personalized experience and offer new products and services that may interest you.

For marketing purposes:

- Laterpay uses your information for marketing purposes, including to communicate with you about products, services, charities and other organizations and activities that may interest you. In order to tailor these communications, we evaluate your Laterpay activities, often by using automated processing. The results of these evaluations enable us to offer you discounts, for instance, on services similar to those you have demonstrated an interest in. You may opt out of being included in marketing communications by contacting us as explained in Section 9 below.

4. HOW WE SHARE YOUR INFORMATION

We will not share your information with third parties outside Laterpay except as noted in this Privacy Policy or with your explicit consent.

Parties with whom we may share your information:

- Merchants. Laterpay shares limited information with merchants, including end users’ name, address (if collected), email address and preferred language, as well as transaction details, including item purchased, purchase date, VAT/Sales Tax information, subscription terms information and renewal periods after you have conducted a transaction with that specific merchant. Merchants may use this information to inform you by mail, email or digital advertising of their products and/or services that might be of interest, i.e. for marketing purposes, or for the fulfillment of their services, including to provide you with a donation receipt, if applicable. We also monitor whether payments from end users are received on time and provide that information to our merchants. Merchants contractually commit to protect the security and confidentiality of personal information they process on our behalf. Additionally, Laterpay may share aggregated results of analysis of user behavior described above with Laterpay merchants.
- Affiliates. We may share information regarding Laterpay content and/or your information (including but not limited to, information from cookies, log files, device identifiers, location data, and usage data) with businesses that are legally part of the same group of companies that Laterpay is part of, or that become part of that group, including Laterpay GmbH (“affiliates”). Affiliates may use this information to help enable and improve the Laterpay service and affiliates’ own services.
- Service providers. We may share your information, including reference numbers, ZIP code information, information from tools like cookies, log files, and browser fingerprint information, with resellers, payment service providers, hosting providers, Google Analytics and other third-party organizations that help us provide or improve the Laterpay service (“service providers”). Our service providers will be given access to your information only as is reasonably necessary to provide Laterpay with their services, generally under data processing agreements that require them, among other things, only to act on Laterpay’s instruction and to take sufficient technical and organizational measures to safeguard your information.
- Advertising partners: We may share certain information such as cookie information with third-party advertising partners. This information would allow third-party ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. We will not share your
information with third parties for direct marketing purposes without your consent.

- **Payment service providers.** We share name and country information with our payment service providers to help us perform some of the credit and fraud risk assessments described in Section 3.

- **Sharing as part of a change of control.** If we sell or otherwise transfer part or all of the Laterpay business, or our assets, to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, or liquidation), your information may be among the items sold or transferred. The buyer or transferee would be obligated to honor the commitments we have made in this Privacy Policy.

- **Sharing in response to a legal request or to prevent harm.** We may access, preserve and share your personal information in response to a legal request (like a search warrant, court order or subpoena) if we have a good faith belief that a law, regulation, or governmental request requires us to do so. This may include responding to legal requests from jurisdictions outside of the United States. We may also access, preserve and share information when we have a good faith belief it is necessary to: detect, prevent and address fraud and other illegal activity; to protect ourselves, you and others, including as part of investigations; and to prevent death or imminent bodily harm. Information we receive about you may be accessed, processed and retained for an extended period of time when it is the subject of a legal request or obligation, governmental investigation, or investigations concerning possible violations of our terms or policies, or otherwise to prevent harm.

5. HOW WE STORE YOUR INFORMATION

**Storage and processing:**

- Your information collected through Laterpay may be stored and processed in the United States or any other country in which Laterpay, its affiliates or service providers maintain facilities.

- Laterpay, its affiliates, and/or service providers may transfer personal information across borders and from your country or jurisdiction to other countries or jurisdictions around the world that may not have the same data protection laws as your jurisdiction. Regardless of where your information is processed, we apply the same protections as are described in this policy. In instances where information is transferred, we ensure a sufficient level of protection for the rights of data subjects based on the adequacy of the receiving country’s data protection laws, contractual obligations on the recipient of the data, or privacy shield principles.

- We use commercially reasonable safeguards to help keep the information collected through Laterpay secure and take reasonable steps to verify your identity before granting you access to your account. However, Laterpay cannot ensure the security of any information you transmit to Laterpay or guarantee that information on Laterpay may not be accessed, disclosed, altered, or destroyed.

- You are responsible for maintaining the secrecy of your unique password and account information, and for controlling access to emails between you and Laterpay, at all times. We are not responsible for the functionality, privacy, or security measures of any other organization.

6. YOUR CHOICES ABOUT YOUR INFORMATION

You have choices about our use and disclosure of your information and may contact us using the information below if you would like to request any of the following services.

For personal information that we have about you, we offer:

- **Deletion:** You can ask us to delete all or some of your personal information (e.g., if it is no longer necessary to provide the Laterpay service to you).

- **Updating:** You can edit some of your personal information through your account. You can ask us to update your information in certain cases, particularly if it’s inaccurate.

- **Limit our use of your information:** You can ask us to stop using all or some of your personal information or to limit our use of it (e.g., if your personal information is inaccurate or unlawfully held).

- **Access:** You can request a copy of your personal information.

**How long we keep your information:**

- We will retain your information as long as your account is active, as necessary to provide you with the Laterpay service or as otherwise set forth in this Privacy Policy. We will also retain and use this information as necessary for the purposes set out in this Policy and to the extent necessary to comply with our legal obligations, resolve disputes, enforce our agreements and protect Laterpay’s legal rights. We may retain aggregated, deidentified or pseudonymized information indefinitely to protect the safety and security of our site, improve our services or comply with legal obligations.

- If you do not access your digital content or use the Laterpay service for a period of eighteen (18) months, Laterpay may delete your information.

7. CHILDREN’S PRIVACY

Laterpay does not knowingly collect or solicit any information from anyone under the age of 18 or knowingly allow minors to register for Laterpay. Laterpay and its content are not directed at anyone under the age of 18. In the event that we learn that we have collected personal information from a child under age 18, we will delete that information as quickly as possible. If you believe that we might have any information from or about a child under age 18, please contact us at support_us@laterpay.net.

8. OTHER WEB SITES AND SERVICES

Please remember that when you use a link to go from our service to another website or service, our Privacy Policy or other terms do not apply to those third-party websites or services. Your browsing and interaction on any third-party website or service,
including those that have a link on our website, are subject to that third party’s own rules and policies.

9. HOW TO CONTACT US

If you have any questions about this Privacy Policy or Laterpay, please contact us at privacy@laterpay.net.

If you live in the United States, the party responsible for your personal information is Laterpay, Inc.:
Laterpay, Inc.
Attn: Privacy Policy Inquiry
205 E. 42nd St., Floor 20
New York, NY, 10017

If you live outside the United States, the data controller is Laterpay GmbH:
Laterpay GmbH
Attn: Data Protection Officer
Oskar-Von-Miller-Ring 20
D-80333 Munich
GERMANY

10. CHANGES TO OUR PRIVACY POLICY

Laterpay may modify or update this Privacy Policy from time to time, so please review it periodically. We may provide you additional forms of notice of modifications or updates as appropriate under the circumstances. Your continued use of Laterpay after any modification to this Privacy Policy will constitute your acceptance of such modification.

Status: V5.0, August 2020