



PRIVACY POLICY

Viamerica's values your business and therefore prioritizes the protection of all personal information it collects from you that can be used to identify you as an individual.

The business practices and policies described below for collecting, processing and using consumer personal information shall apply to all personal information we obtain anytime you interact with us when you amongst other things: (i) use our website or mobile application, (ii) access third party mobile apps in which our services are hosted and made available, (iii) provide information at participating walk-in retail locations or (iv) when you submit any information to us orally or in writing through any online mechanism (i.e. e-mail) and/or by contacting our call centers.

Viamerica's reserves the right to amend this privacy policy at any time. Unless stated otherwise, any changes performed to this document will become effective at the earliest of (i) the date a revised version is published on our website or made available in any mobile app providing our services or (ii) written notice is delivered to you by any other communication method.

WHAT INFORMATION WE COLLECT AND WHY. We may collect, store and use the following information:

Personal Information. COMPLETE NAMES, SOCIAL SECURITY NUMBERS OR COPIES OF GOVERNMENT ISSUED IDS, date of birth, addresses, telephone numbers, e-mails, financial information (which include bank account and routing information and debit/credit card information), transaction history, information available from third parties such as identity verification services and credit reporting agencies, phone conversation recordings and email exchange with our personnel.

NON-PERSONAL INFORMATION. Data that does not permit a direct association with any specific individual such as hardware and software identifiers, geolocation, browser type, internet service provider, referring/exit pages, operating system, IP address, and browsing history logs as well as other information from and about your device (such as device properties, settings, applications, stored information and usage) and carrier; operating system software; usage date and time stamps of use and access to our website and/or applications.

USE OF INFORMATION.

Our goal is to provide you with innovative, efficient, secure, and cost effective services. Most of the data and information we collect from you is used primarily for this purpose; however, it may also be used separately or as a whole for market, consumer and product analysis aimed at strengthening our fraud prevention and risk mitigation tools as well as to design, develop and implement enhancements and user interface improvements that simplify and streamline transaction processing and improve overall customer experience.

Viamerica's may wish to verify the veracity of the information it collects when it perceives a higher risk of mistake, loss, fraud, or illegality is present and it may contact third parties by phone (references, employer, landlord, or financial institution, for example) or access reputable reference sources, directories, consumer reports, public records, and other data suppliers, government agencies or business partners to validate any information it collects.

Information we collect from you will be used for the following:

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- Process transaction and collect payment;
- Verify your identity, provide customer service and answer questions regarding your accountour services and any specific transaction;
- Manage a loyalty card program and allow our partners to fulfill promotional obligations to you or offer discounts, market new services, provide service updates, and communicate promotional offers in general;
- Prevent fraud or loss to yourself, to us, or to other persons;
- Conduct financial, technical, or security tests and audits;
- Institute collection actions and to report fraud or delinquency to consumer reporting agencies or law enforcement authorities;
- Establish claims or defenses in litigation;
- Make insurance claims or applications;
- Collaborate in criminal and government investigations;
- Satisfy due diligence requirements in the event of a merger, acquisition or any form of sale of some or all of its business;
- To comply with applicable laws and regulations; and
- To comply with judicial orders, subpoenas, warrants, or lawful informationrequests from regulatory or law enforcement authorities.

TRANSACTION RECORDS AND PUSH NOTIFICATIONS. Each time you configure a transaction, we make a record of that transaction and all related information. We maintain these records for as long as possible but as a minimum for a term equal or longer to any statutory period in which claims could be made in the event of a dispute. We may use some of this transaction history to create a customer profile that will allow us to serve you more efficiently and to offer you relevant products and services. We may send you emails or push notifications by SMS or through our Mobile App containing marketing and promotional messages and/or to provide you transaction related notifications that may be relevant to you.

GEOLOCATION & COOKIES. Our applications may require access to track your geolocation using your mobile device when using our service or our applications in order to provide you with location based information or services, to collect information for fraud mitigation purposes and to decline transactions originating outside authorized jurisdictions. Furthermore, 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. You may configure your web



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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.

BROWSING & THIRD PARTY ANALYTICS. When you use our websites, we may automatically collect certain non-personal information. We will use this information to improve our website, optimize our websites performance and to better understand how visitors use our website. Analytics tools or software may be used to help us better understand customer behavior. When third party analytics services and tools are used, access to information will be restricted to anonymous non-personal information that will only be used to satisfy service requests made by Viamericas outlined prior, during or following disclosure of such information.

DISCLOSING PERSONAL INFORMATION TO OTHERS. We shall not sell or rent the information we collect to third parties so that they can use it to directly contact you for their own promotional purposes unless we receive your permission to do so. However, we may share personal or transactional information with (a) financial and non financial entities (such as our agents, banks, payment processing services, technology service providers, and retail merchants) that intervene in the processing and completion of a transaction, (b) our employees, agents, independent contractors, data processors, auditors, bankers, insurers, lawyers, consultants, vendors and suppliers, (c) third-parties providing data verification, (d) consumer reporting and bill collection agencies, and (e) government agencies, officials, courts, and litigants.

Access to personal information is restricted to employees and service providers who need to have access to that information as described in this privacy statement. Our service providers are required to observe standards for the security, collection, use and sharing of personal information, and to comply with applicable law.

For online transactions, Viamericas uses Plaid Technologies, Inc. ("Plaid") to gather customer's data from financial institutions. By using our online service, you grant Viamericas and Plaid the right, power, and authority to act on your behalf to access and transmit your personal and financial information from the relevant financial institution. You agree to your personal and financial information being transferred, stored, and processed by Plaid in accordance with its Privacy Policy (available at <https://plaid.com/legal>).

SECURITY. Viamericas meets industry standard requirements and best practices to communicate, process, preserve and protect the integrity and confidentiality of the information we receive from you. Notwithstanding our best efforts, we cannot guarantee invulnerability of our safeguards since no method of transmission and storage of electronic data is considered 100% secure.

ACCESS AND UPDATE YOUR INFORMATION. You will be granted unlimited access to modify or update the information you provide to us by logging into your account and changing such data on our website, mobile app or by contacting any of our Customer Service representatives. Please note that Viamericas will take reasonable steps to verify your identity before granting you access or enabling you to make any profile corrections.

PREVENTING IDENTITY THEFT. Viamericas will never initiate requests for submission of personal information or request such information from you by fax, SMS or email. All personal information sent to Viamericas should be performed by logging into our web page, through the mobile app, via posted mail, phone or fax unless prompted otherwise by the Mobile App or a website in an active session.



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Do not be misled by emails that appear to be from us and ask for personal information. If you receive a suspicious email requesting your personal information, please forward the email immediately to us. To report fraud to the Internet Fraud Complaint Center, visit www.ic3.gov/.

OFFERS AND CONTACTS. We may present you with special offers for products and services from Viamericas, its affiliates, or selected business partners, that we believe will be of interest to you. For this purpose we may use all the information we gather from you to personalize our offers by selecting those that we consider are most appropriate for you which may include third party offers. Please be aware that if you respond to these offers and get in touch with our affiliates and business partners directly, you will need to review their privacy policies independently as Viamericas is not responsible or in any way involved in the implementation of their privacy practices.

If you no longer want to receive promotional emails, push notifications, or SMS messages you should call Customer Service, unsubscribe from such mailing lists, or disable such notices in your account. You can stop receiving SMS messages by replying to any message with the words "STOP" or "PARAR".

PRIVACY PRACTICES OF THIRD PARTIES. Our website and any mobile app in which Viamericas provides its services may have links to other websites and/or may include services provided by other companies that apply different privacy standards. Viamericas shall not be liable of the content or privacy practices in effect in other websites or enforced by other companies that are or in the future may be linked to or form part of our website or any mobile app in which we make our services available.

We encourage you to review the specific terms and privacy policies that govern each site or mobile app before providing any personal information to a third party. For clarity purposes, Viamericas may only request and collect personally identifiable information from you during the creation, access or use of your account on our website, our mobile apps or when accessing the Viamericas money transfer module on any 3rd party mobile app through which our services are made available.

USE BY CHILDREN. Our website is not directed at children under the age of 13. In compliance with the United States Children's Online Privacy Protection Act,

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

CONTACT US AND COMPLAINTS. If you wish to review your privacy settings, change your account information, or contact us with any other questions or concerns, our customer service representatives may be reached at 1-800-401-7626, or through our website: <https://www.govianex.com/#/contact-us>

If you are a Texas resident and you still have an unresolved complaint regarding Viamericas, please direct your complaint to: Texas Department of Banking: 2601 North Lamar Boulevard; Austin, Texas 78705; 1-877-276-5554 (toll free); www.dob.texas.gov or email consumer.complaints@dob.texas.gov.

Effective September 25, 2017. The practices and policies contained in this disclosure are subject to change, but we will communicate any material changes as required by applicable law.