



Last Modified: November 22, 2017

## SmartPay Solutions, LLC PRIVACY STATEMENT

This privacy statement discloses the privacy practices for the website of SmartPay Solutions, a Connecticut Limited Liability Corporation ("SmartPay") ("Website"). This privacy statement applies solely to Personal Information collected at the SmartPay Website, and describes the types of information we may collect from you or that you may provide when you visit the SmartPay Website and our practices for collecting, using, maintaining, protecting and disclosing that information. It does not apply to information collected offline or through any other means, including on any other website by SmartPay or any third party including through any application or content (including advertising) that may be linked to or be accessible from or on the SmartPay Website. By using the SmartPay Website, you expressly consent to the information handling practices described in this Privacy Statement. Please read the complete privacy statement.

### INFORMATION COLLECTION, USE, AND SHARING

We collect several types of information from and about users of our Website, including information by which you may be personally identified, such as name, postal address, e-mail address, telephone number or any other information the website collects that is defined as personal or personally identifiable information under an applicable law or any other identifier by which you may be contacted online or offline ("personal information"); that is about you but individually does not identify you; and/or about your internet connection, the equipment you use to access our Website and usage details.

We collect this information directly from you when you provide it to us; automatically as you navigate through the site (information collected automatically may include usage details, IP addresses and information collected through cookies, web beacons and other tracking technologies); and/or from third parties.

We may receive information about you from third parties who help us update, expand and analyze our records, and improve our website experience. We do not use this information to identify you individually, but it does reflect some of your activities on the Internet, such as the web sites you visited immediately before visiting the Website or links available at other websites which directed you to the Website.

We will use information that you provide to us to respond to you, regarding the reason you contacted us, and to provide you with information about SmartPay, our events, services, materials and our other activities. We will not intentionally share your information with any unaffiliated third party outside of our organization, other than as necessary to fulfill your request, e.g. to respond to your emails or questions or to provide services to you. Generally, these third parties are required not to use your information other than to provide the services requested by SmartPay. We may share your information with affiliated companies and our third party service providers in order to provide better service to you. We may also receive information from or about you from other sources like telephone or facsimile. We may add this information to the information we have already collected from you via our Website to serve you better.

### RIGHT TO REVIEW & CORRECT PERSONAL INFORMATION

If you live in AZ, CA, CT, GA, IL, MA, ME, MT, NC, NJ, OH, OR, VA you may review the personal information we have gathered about you. You may send a letter to: Chief Privacy Officer, SmartPay Solutions, 200 Executive Blvd., Suite 3A Southington, CT 06489.

The letter should include name, phone number and email address and describe the records that the consumer wants to review. Upon receipt of this request, we will review our records and inform you if we have the information sought and if it is reasonably locatable and retrievable. If it is, you may request that we email you a copy. We will disclose to you who else received the information in the past two years or who would normally have received it in the past two years. We may charge you a fee.

You may ask us to fix mistakes in our records. If we agree, we will correct our files. Upon request, we will send revised information to a person who received information from us in the past two years. If we disagree, you may file a short statement of dispute. The statement will be included with information we share in the future. Upon request, we will send the statement to a person who received information from us in the past two years.

### HOW WE PROTECT THE INFORMATION WE COLLECT

We have implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration and disclosure. All information you provide to us is stored on our secure servers behind firewalls. During transmission of personal information (including payment information) between you and our Website, we use Secure Sockets Layer (SSL) software to encrypt information you input.

All our users' information is restricted in our offices. Only employees who need the information to perform a specific job (for example, a customer service representative) are granted access to personally identifiable information. All employees with access to personal information are kept up-to-date on our security and privacy practices. After a new policy is added, these employees are notified and/or reminded about the importance we place on privacy, and what they can do to enhance protection for our customers' information. Finally, the servers that we use to store personally identifiable information are kept in a secure, restricted access area.

Unfortunately, the transmission of information via the internet is never completely secure. Although we do our best to protect your personal information, we cannot guarantee the security of your personal information transmitted to our Website. Any transmission of personal information is at your own risk. We are not responsible for circumvention of any privacy settings or security measures contained on the Website.

### DATA RETENTION

We will retain your information for as long as your account is active or as needed to provide you services, comply with our legal obligations, resolve disputes, and enforce our agreements.

### CHANGES TO OUR PRIVACY POLICY

It is our policy to post any changes we make to our privacy policy on this page. If we make material changes to how we treat our users' personal information, we will notify you through a notice on the Website home page. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you, and for periodically visiting our Website and this privacy policy to check for any changes.

#### HAVE QUESTIONS?

If you have any questions about our Privacy Policy or our privacy practices, we'll do our best to answer them. Here's how to contact us:

**Phone | Main Phone:** (877) 905-0786

**Email | Information Security:** [infosecurity@smartpayllc.com](mailto:infosecurity@smartpayllc.com)

**Mailing Address:**

**SmartPay Solutions, LLC**

200 Executive Blvd., Suite 3A, Southington, CT 06489