

PRIVACY POLICY

This Privacy Statement applies to information collected by Monty Global Payments USA, LLC (MGP) in connection with the Services.

MGP takes your privacy very seriously. This Privacy Policy applies to MGP websites (for purposes of this Privacy Policy, "**websites**" includes www.clicktransfer.us, our mobile websites, and our mobile applications) and the services associated with it ("**MGP**" or "**the Service**").

This Privacy Policy applies to information related and retrieved in connection to the Service.

Terms used but not defined in this Privacy Policy have the meanings assigned to them in our User Agreement.

MGP is committed to protecting our customers' privacy and security. This Privacy Policy explains what personal information we collect about you, with whom we share it, and how you (the user of the Service) can direct us not to share certain information with certain parties. "Personal Information" refers to information that can be used to identify an individual.

You should read this Privacy Policy in its entirety. Certain sections may apply differently to residents of different jurisdictions.

1. Description

The types of personal information we collect and share depend on the product or service you have with us. We may collect the following information about the Sender and Beneficiary, which may include non-public Personal Information:

- government identification numbers, such as driver's license, state identification, passport, visa, Social Security or tax identification number;
- name, address, email address, mobile and home telephone number, age, date of birth, gender, citizenship, occupation and marital status;
- account balances and transaction history;
- credit, debit, bank account and payment history information;
- computer and mobile device information, such as the domain and host you use to access the Internet; your computer's IP address; mobile device geolocation, number and 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; websites you have visited or later visit, social profile and network information; the date and time you access our website, the internet address used to link to our website when you visit us, and cookie information.

You consent to our collection, storage and transfer of information by computers or storage devices in the United States and elsewhere.

2. Reason for Collecting your Information

- a. To process your Transactions;
- b. To verify your identity;
- c. To collect payment for your use of the Service;
- d. To allow our partners to fulfill their promotional obligations to you;
- e. To troubleshoot problems with the Service;
- f. To comply with applicable laws, regulations, and rules, such as those relating to "know-your-customer" and anti-money laundering requirements;
- g. To detect and prevent fraud and other illegal uses of the Service; and
- h. To send you marketing notices, service updates, and promotional offers.

3. Method for Collecting your Information

We collect your personal information, for example, when you:

- a. send or receive money, complete a payment or use or request other products or services from us or other financial companies;
- b. submit information to us, our Agents or other third parties on applications, forms, and by other means;
- c. use or visit our or other online sites (for example, to complete a transaction, manage your accounts, or provide your choices);
- d. enter a promotion, register for email alerts or marketing communications, or join a loyalty program;
- e. use our mobile app or internet sites, such as www.clicktransfer.us.

We also collect and corroborate information about you from a variety of sources, including without limitation, computer systems and mobile devices; third party sources such as our business clients, government agencies, advertising agencies and networks, social media operators and networks, and other suppliers of information; and consumer reporting agencies.

We may collect, track and combine information across devices, platforms and transaction channels.

4. Disclaimer: Software and Analytics Assessing your Information and Use of the Service

As is true of most websites, we gather certain information automatically and store it in log files. This information may include your internet protocol (IP) address, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data. From time to time, we may combine this automatically collected data to other information we collect about you for reasons such as analysis, security, content generation or marketing.

We may use the analytics tool in order to develop and analyze use of the Service. Analytics companies may access anonymous data (such as your identifier for advertising or device identifier) to help us understand how the Service is used. They use this data on our behalf and do not use this data for their own purposes except in aggregate form; they do not share data as to any individual user except in limited circumstances. If you wish to opt-out from analytics, please follow this [link](#).

We may use mobile analytics software to allow us to better understand the functionality of our mobile software on your mobile device. This software may record information such as how often you use the mobile applications, the events that occur within the mobile applications, aggregated usage and performance data, and location from where the mobile application was downloaded. We may link the information we store within the analytics software to any Personal Information you submit within the mobile applications.

We engage third parties, such as marketing or analytics partners, who may collect information about your online activities over time and across different websites when you use our websites. Third parties, with whom we partner to provide certain features on our websites or to display advertising based upon your Web browsing activity and to collect and store information.

5. Use of Information

MGP does not sell or rent the information we collect to third parties for their promotional purpose unless we receive your permission to do so.

Nevertheless, we may share information about the Sender and the Beneficiary (including non-public Personal Information) in the following manners:

Disclosures not subject to an opt-out choice include: disclosures necessary to effect, manage or execute a transaction you requested; disclosures to our authorized vendors, or service providers; disclosures permitted or required by law or disclosures to prevent fraud or other illegal activities.

Without obtaining your consent, MGP has the right to share your personal information for the following reasons:

- For our everyday business purposes, such as to process your transactions; manage our consumer relationships; provide requested products and services; maintain your account(s); respond to court orders and legal investigations; report to credit bureaus; gather information about website access, usage and performance; enhance your consumer experience; validate your creditworthiness or your identity; in connection with a merger, acquisition or sale of the company or any of its assets; make risk decisions; detect and prevent fraud and other illegal activity; or as otherwise permitted or required by law.
- For our marketing purposes such as to offer our products and services to you or notify you about future events and promotions.
- For our affiliates' everyday business purposes such as information about your transactions and experiences.
- In the event of the sale, acquisition or merger of some or all of our assets, Personal Information about you, your Recipient or your Beneficiary might be a part of the transferred assets. We shall notify you in the event of such an occurrence and inform you of any choices you may have regarding your Personal Information, by placing a notice on our websites;
- Law enforcement, government officials or other third parties, but only in connection with a formal request, subpoena, court order, or similar legal procedure; or
- When we believe in good faith that disclosure is necessary to comply with the law, prevent physical harm or financial loss, report suspected illegal activity, or to investigate violations.

After obtaining your consent, MGP has the right to share your personal information for the following reasons:

- For our affiliates' everyday business purposes such as information about your creditworthiness.
- For our affiliates to market to you.
- For non-affiliates to market to you.

If you prefer that we limit sharing with affiliates or nonaffiliated third parties as described above, you may opt-out of those disclosures through any of the following methods:

Call: 1-786-378-8044

Visit us online: www.clicktransfer.us, log into your account and edit your Profile settings.

Email: customerservice@clicktransfer.co

Mail to:

Monty Global Payments USA LLC.

2999 NE 191 St. Suit# 702.

Aventura, FL. 33180

Please note: If you are a new consumer or customer, we are entitled to begin sharing your information 30 days from the date we provided this notice. When you are no longer our consumer or customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

6. Access to your Information

If your personal information changes, or if you no longer wish to use our Service, you can access, modify, delete or update your Personal Information submitted on our websites by logging in to your account and changing your preferences or by contacting MGP Customer Service. We will respond to your request within a reasonable timeframe.

7. Choices you can make about our use of your information

Federal and state laws allow you to restrict the sharing of your Personal Information in certain instances. However, these laws also state that you cannot restrict other types of sharing.

If, after giving us your permission to share your Personal Information with third parties with whom we market our jointly offered products, you later decide that you no longer want us to share such information, you may notify us by email at customerservice@clicktransfer.co; or by mail at the address above.

You may also opt-out from promotional email messages to you or your blog subscription by accessing your Email Preferences under "My Account" or selecting the "Unsubscribe" function present in each promotional or blog email message we send out and providing the required information.

8. Usage of Cookies and Opting Out Right

MGP and our third-party service providers, including our marketing partners and analytics providers, may also use cookies, web beacons, tags, scripts and similar technology ("Cookies"). Cookies are small data files that are placed on your computer or mobile device to, among other things, administer the website, track and analyze trends in your use of our websites, remember your preferences when you return to the website and gather information about our users as a

whole. The information we store in the Cookies we place may include your email address in addition to non-Personal Information. We may receive reports from third-party service providers based on their use of Cookies about our users on an individual or aggregated basis.

You are free to decline the Cookies we place if your browser permits, but doing so may interfere with your use of the Service. The use of Cookies by our third-party service providers is not covered by this Privacy Policy. You are free to decline these Cookies if your browser permits. We do not have access or control over these Cookies. In addition, some of our third party advertising vendors or partners show our ads on sites across the Internet. These vendors or partners may use Cookies to gather information about your activities on our website and other websites in order to serve you advertising based on your browsing activities. We do not necessarily have access to or control over the Cookies they use, but you may be able to opt-out of some of their practices

9. Security Notice

To help protect your personal information from unauthorized access and use, we endeavor to use reasonable security measures. These measures can include physical, electronic and procedural safeguards such as computer safeguards and secured files and buildings. We also endeavor to limit access to personal information to only employees, agents and representatives that need to know. Despite our efforts, third parties may unlawfully intercept or access your personal information, transmissions to us, or may wrongly instruct you to disclose information to them. Always use caution and good judgment when sending money and when using internet and mobile technologies.

10. Child Privacy

Our website is not directed at persons under the age of 18. MGP does not knowingly collect or maintain information at our website from persons under the age of 18.

11. Third Party Websites

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

12. Modifications and Updates

This Privacy Statement has been revised as of May 2017. MGP reserves the right to modify this Privacy Statement. You can get updated Privacy Statements by calling us at 1-786-378-8044 or by visiting our website at www.clicktransfer.us.

13. Questions?

Call 1-786-378-8044, or click on the “Contact Us” link at the bottom of the page at www.clicktransfer.us.

14. Definitions

Affiliates: Companies related by common ownership or control. They can be financial and nonfinancial companies.

Non-affiliates: Companies not related by common ownership or control. These can be financial and nonfinancial companies.

Joint Marketing: A formal agreement between nonaffiliated financial companies that together market financial products or services to you.