

# Pinpoint Payments Privacy Policy-Updated 4.24.2020

## RIGHTS

### Right to be Informed

#### *Data Collected*

Pinpoint Intelligence, LLC dba Pinpoint Payments (“Pinpoint”) collects personal data from website visitors, customers, vendors, and partners. The only personal data Pinpoint retains from website visitors is IP addresses. Pinpoint collects additional forms of personal data (addresses, social security numbers, phone numbers, or any data necessary to provide merchant services) from customers, vendors, partners, etc.

#### *Data Use*

Personal data is used in accordance with applicable laws for the following purposes:

- Carrying out and improving Pinpoint ‘s marketing campaigns
- Underwriting potential merchants
- Abiding by the FinCEN Know Your Customer requirements
- Requesting credit checks for merchants and partners
- Locating merchants for remittance of money or collection efforts
- Developing and improving our products and services, for example, by reviewing visits to our website and its various subpages to ascertain demand for specific content
- Complying with applicable law, for example, in response to a request from a court or regulatory body, where such request is made in accordance with the law
- Fulfilling and managing purchases, orders, payments, and returns/exchanges

Pinpoint does not retain website visitors’ personal data longer than necessary to improve the website experience and marketing strategy. If you voluntarily register or input information on the website, you are consenting to Pinpoint retaining your personal data for a reasonable amount of time to contact you regarding Pinpoint’s services. For customers, vendors, and partners, Pinpoint will retain the information for the life of the relationship. In addition, if regulations require Pinpoint to keep any data, Pinpoint will retain it for the statutorily required time frame after the relationship has terminated.

#### *Sharing With Partners*

Pinpoint shares personal data with partners for the purpose of providing requested services and products. Pinpoint will share personal data with acquiring banks, payment processors, hardware vendors, and software vendors in order to deliver complete merchant services necessary for your business to accept electronic payments. Pinpoint will only provide personal data to third parties with your consent.

#### *Legal Basis for Use*

Pinpoint legally processes the personal data based on the following lawful practices where:

- Pinpoint has the consent to process your personal data for one or more specific reasons
- Processing your personal data is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract
- Processing is necessary for compliance with a legal obligation to which the controller is subject
- Processing is necessary in order to protect the vital interests of you or another natural person

### **Right to Object**

You may request that Pinpoint does not collect your data while you visit its website. If you are a customer, vendor, partner, etc. and you object to the collection of data that is necessary to sustain the business relationship, Pinpoint may be forced terminate the relationship. If you do not want any of your information collected, please contact [compliance@pinpointintel.com](mailto:compliance@pinpointintel.com).

### **Right to Access**

Upon request, Pinpoint will provide you with a copy of your personal data that Pinpoint has retained. Pinpoint will only provide you with your personal data that Pinpoint has in its possession. Pinpoint will provide the data without delay and likely within thirty (30) days of the request. Pinpoint will inform you if a response to the request cannot be completed within thirty (30) days. In no event, will Pinpoint take longer than ninety (90) days after the request has been received. Pinpoint has the right to verify your identity before disclosing any personal data or responding to any objections or requests.

### **Right to Challenge**

After you have reviewed the data, you have the right to challenge the validity of the data and have it changed if it is incorrect. Please contact Pinpoint at [compliance@pinpointintel.com](mailto:compliance@pinpointintel.com) if you would like to challenge any of your data that you have reviewed after it was provided by Pinpoint.

### **Right to Transfer**

The personal data that Pinpoint holds is portable upon request by the owner of the personal data. Pinpoint will coordinate with you to transfer the data to the proper processor while maintaining the appropriate privacy protections.

### **Right to Erase**

Upon request, Pinpoint will to permanently erase your personal data within thirty (30) days. If Pinpoint cannot complete the erasure within thirty (30) days, Pinpoint will inform you of the delay. In no event will it take longer than ninety (90) days after the request to complete the erasure. Pinpoint has the right to keep your personal data where regulations require Pinpoint to retain the personal data for a specific time period.

## **MONITORING**

Pinpoint maintains administrative, technical, and physical safeguards to protect your personal data. When Pinpoint collects or transmits sensitive information, Pinpoint uses industry standard methods to

protect that information. However, no e-commerce solution, website, mobile application, database or system is completely secure. You are also responsible for taking reasonable steps to protect your personal information against unauthorized disclosure or misuse.

### **INTERNATIONAL TRANSFERS**

Pinpoint, with its headquarters in Queens, New York, and its subsidiaries and partners collect from you may be transferred, stored and processed in a country different from where the data was collected in the European Economic Area (“EEA”). For example, data collected from within the EEA may be stored or processed in the United States.

By using our Pinpoint website or merchant processing, you are permitting the transfer of your Personal Data to Pinpoint in the United States, which has different data protection laws that the EU has not deemed equivalent to those in EU member countries. You consent to the transfer of this information for the uses described in this Privacy Policy to the extent permitted by EU law.

### **DATA PROTECTION OFFICER CONTACT INFORMATION**

Data Protection Officer  
Pinpoint Intelligence, LLC  
ADDRESS  
P: 888-370-9596  
E: support@pinpointpayments.com

### **PRIVACY POLICY CHANGES**

We will occasionally update this Privacy Policy to reflect customer feedback and changes in regulations. We encourage you to periodically review this policy to be informed of how we use your personal data.