

USA Technologies, Inc. Online Privacy Policy

Effective Date: November 17, 2016

Last Updated: March 23, 2020

USA Technologies, Inc. (collectively referred to herein as “USA Tech”, “we”, “our” or “us”), recognizes the importance of protecting Personal Information we may collect from visitors and any other individual or entity (“Users”, “you”, or “your”) who visit our web sites. This Privacy Policy applies to data collection by USA Tech and shall apply to your use of the website, www.usatech.com and other USA Tech-related sites, applications, software, communications, capabilities and services (“Services”) accessible on or by any top-level USA Tech domain owned by us (each, a “Site” and collectively the “Sites”), but excluding services that state that they are offered under a different privacy policy.

Our Privacy Policy explains: (1) what information we collect; (2) why we collect it; (3) how we use that information; (4) how we may share it; (5) the choices we offer, including how to access and update information; (6) and the measures we take to keep your information safe. Specifically, our Privacy Policy covers the following topics:

When this Privacy Policy Applies

Our Privacy Policy applies to all of the Services offered by USA Tech and its affiliates, including some USA Tech partners, and Services offered on other sites, but excludes services that have separate privacy policies that do not incorporate this Privacy Policy.

Our Privacy Policy does not apply to services offered by other companies or individuals, including products or sites that may be displayed to you, or other sites linked from our Services. Our Privacy Policy does not cover the information practices of other companies and organizations who advertise our Services, and who may use cookies, pixel tags and other technologies to serve and offer relevant ads.

Terms of Service

By accessing or using the Sites in any manner, you also agree to USA Tech’s Terms of Service (the “Agreement”). Please read the Agreement carefully. If you do not accept all of the terms and conditions contained in or incorporated by reference into the Agreement, please do not use the Sites.

What information do we collect?

We may collect personal information from you when you register on our web sites. Personal Information means any information that identifies or can be used to identify you. Common examples of Personal Information include: full name, postal address, email address, digital identity, such as a login name or handle, information about your device, and certain metadata.

When registering on our sites, as appropriate, you may be asked to enter your name, e-mail address, contact information, banking or credit card information. You may, however, visit our sites anonymously.

We collect certain information automatically, such as your operating system version, browser type,

and internet service provider. We also collect information about your interaction with the Services, such as creating or logging into your account, or opening or interacting with the Services on Your mobile device. When you use our Site, we automatically collect and store this information in service logs. This includes: details of how you used our Site; Internet protocol address; cookies that uniquely identify your browser, the referring web page and pages visited. We may also collect and process information about your actual location. The information we collect automatically is statistical data and may or may not include Personal Information, but we may maintain it or associate it with Personal Information we collect in other ways or receive from third parties.

What information do we collect related to California residents?

During the last twelve (12) months, we have collected the following categories of Personal Information from consumers.

Category	Type of Identifiers We Collect	Collected
Identifiers.	First and last name, personal postal address, unique personal identifier, online identifier, Internet Protocol address, personal email address, signatures, account ID and password.	YES
Personal information categories listed in the California Customer Records statute (Cal. Civ. Code § 1798.80(e)).	A name, address, telephone number, credit card number, debit card number, or any other financial information.	YES
Internet or other similar network activity.	Browsing history and time, search history, information on a consumer's interaction with a website, application, or advertisement.	YES
Commercial Information.	Records of personal property, products or services purchased, obtained, or considered, or other purchasing or consuming histories or tendencies.	YES
Inferences drawn from other Personal Information.	Profile reflecting a person's preferences, behavior, attitudes; and social media account information.	YES

We obtain the categories of Personal Information listed above from the following categories of sources:

- Directly from our customers or their agents. For example, from information that customers input into ePort Connect.
- Indirectly from our customers or their agents. For example, through information we collect from our clients in the course of providing Services to them.
- Directly and indirectly from activity on our website (www.usatech.com). For example, from website usage details that are collected automatically. In addition, like many companies, we use “cookies” which are small text files a website can use to recognize repeat users, facilitate the user’s ongoing access to and use of the site and to track usage behavior of, for example, the webpages you visit.
- From social media websites, such as Facebook, Twitter, and LinkedIn.
- From third parties that assist us in providing certain transactions and services (e.g. payment processing, hosting), even though it appears that you may not have left our Site.

How do we use your Personal Information?

Any of the information we collect from you may be used in one of the following ways:

- **To personalize your experience**

Your information helps us to better respond to your individual needs.

- **To improve our websites**

We continually strive to improve our website offerings based on the information and feedback we receive from you.

- **To improve our customer service**

Your information helps us to more effectively respond to your customer service requests and support needs.

- **To process transactions**

Your information, whether public or private, will not be sold, exchanged, transferred, or given to any other company for any reason whatsoever, without your consent, other than for the express purpose of delivering the purchased product or service requested.

- **To administer a contest, promotion, survey or other site feature**

- **To send periodic emails**

The email address you provide for order processing, may be used to send you information and updates pertaining to your order, in addition to receiving occasional company news, updates, related product or service information, etc.

Note: If at any time you would like to unsubscribe from receiving future emails, we include detailed unsubscribe instructions at the bottom of each email.

- **To comply with all applicable legal requirements**
- **To enforce our Terms of Use and other agreements**
- **To perform data analysis and testing**
- **To investigate possible fraud or other violations of our Terms of Use or this Privacy Policy and/or attempts to harm our Users**
- **To resolve disputes**
- **To otherwise fulfill the purpose for which the information was provided**

We use the information we collect from our Sites to provide, maintain, and improve them, to develop new services, and to protect our company and our Users.

We use information collected from cookies and other technologies, to improve your User experience and the overall quality of our services. We may use your Personal Information to see which web pages you visit at our Site, which web site you visited before coming to our Site, and where you go after you leave our Site. We can then develop statistics that help us understand how our visitors use our Site and how to improve it. We may also use the information we obtain about you in other ways for which we provide specific notice at the time of collection.

We will ask for your consent before using information for a purpose other than those set out in this Privacy Policy.

Do we sell your Personal Information?

In the preceding twelve (12) months, we have not sold any Personal Information.

How do we protect your information?

We implement a variety of security measures to maintain the safety of your Personal Information when you enter, submit, or access your Personal Information, taking into account technological reality, cost, the scope, context and purposes of processing weighted against the severity and likelihood that the processing could threaten individual rights and freedoms. For example, we restrict access to Personal Information to USA Tech employees, contractors, business partners and agents who need to know that information in order to operate, develop or improve our services. These individuals are bound by confidentiality obligations and may be subject to discipline, including termination and criminal prosecution, if they fail to meet these obligations. We use commercially reasonable security measures such as encryption, firewalls, and Secure Socket Layer software (SSL) or hypertext transfer protocol secure (HTTPS) to protect Personal Information.

We offer the use of a secure server. All supplied sensitive/credit information is transmitted via industry accepted secure communication technology and then encrypted into our Database to be only accessed by those authorized with special access rights to our systems, and are required to keep the information confidential.

We keep on file only the minimum required information to properly support our customers and their accounts. All other information is destroyed.

Do we use web site cookies and similar technologies?

We and our partners use various technologies to collect and store information when you visit one of our services, and this may include using cookies or similar technologies to identify your browser or device. We also use these technologies to collect and store information when you interact with services from our partners, such as advertising services. Our third party advertising and analytics partners include Adroll, Google Ads, Google Analytics, Mediavision, Facebook Ads and similar partners.

The technologies we use for this automatic data collection may include:

- **Cookies.** A cookie is a small file placed on the hard drive of your computer. You may refuse to accept browser cookies by activating the appropriate setting on your browser. However, if you select this setting you may be unable to access certain parts of our services. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you direct your browser to our services. For more information about the cookies we use on our Site, please see our [Cookie Policy](#).
- **Web Beacons.** Pages of our services or our e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags and single-pixel gifs) that permit us, for example, to count Users who have visited those pages or opened an e-mail and for

other related website statistics (for example, recording the popularity of certain website content and verifying system and server integrity).

- **Clickstream Data.** Clickstream data is information collected by our computers when you request Web pages from the Sites. Clickstream data may include information such as the page served, the time spent viewing the page, source of the request, type of browser making the request, the preceding page viewed and similar information. Clickstream data permits us to analyze how visitors arrive at the Sites, what type of content is popular, what type of visitors in the aggregate are interested in particular kinds of content on the Sites.

Do we disclose any information to outside parties?

We do not share Personal Information with companies, organizations and individuals outside of USA Tech unless one of the following circumstances applies:

- **With your consent.** We will share Personal Information with companies, organizations or individuals outside of USA Tech when we have your consent to do so.
- **Business Accounts.** Your employer or your organization may offer you access to our Services. We will share Personal Information with your employer or organization. Your employer or organization can review and manage your use of such Services.
- **For external processing.** We may provide Personal Information to our affiliates or other trusted businesses or partners to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. These third parties include marketing partners, third party hosted services providers, and similar partners. It is our policy to only share Personal Information with contractors, service providers and other third parties who are bound by contractual obligations to keep Personal Information confidential and use it only for the purposes for which we disclose it to them. Under certain circumstances, you may avoid having us share your information with our business partners and vendors by not granting us permission to share your information. Not granting us permission to share your information with our business partners or vendors may limit your access to their services through the Sites.
- **For Legal Reasons.** We will share Personal Information with companies, organizations or individuals outside of USA Tech if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:
 - meet any applicable law, regulation, legal process or enforceable governmental request.
 - enforce applicable Terms of Use, including investigation of potential violations.
 - detect, prevent, or otherwise address fraud, security or technical issues.
 - protect against harm to the rights, property or safety of USA Tech, our Users or the public as required or permitted by law.

We attempt to notify Users about legal demands for their Personal Information when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

- **Business Transfers.** If we establish a new related entity, are acquired by or merged with another organization, or if substantially all of our assets are transferred to another organization, Personal Information about our Users is often a transferred business asset. In the event that USA Tech itself or substantially all of our assets are acquired, Personal Information about our Users may be one of the transferred assets.
- **Non-Personal and Aggregate Site Use Information.** USA Tech may compile and share your information in aggregated form (i.e., in a manner that would not personally identify

you) or in de-identified form so that it cannot reasonably be used to identify an individual (“De-Identified Information”). We may disclose such de-identified information publicly and to third parties, or to USA Tech Partners under agreement with us.

In the preceding twelve (12) months, we have disclosed the following categories of Personal Information for one or more business purposes:

- Identifiers;
- California Customer Records Personal Information categories;
- Commercial information;
- Internet or other network activity information;
- Inferences drawn from other Personal Information.

We disclose your Personal Information for a business purpose to the following categories of third parties:

- Our affiliates;
- Third parties to whom you or your agents authorize us to disclose your Personal Information in connection with the Services we provide to you.
- Service providers and other third parties we use to support our business, including without limitation those performing core services (such as credit card processing, customer support services, customer relationship management, accounting, auditing, advertising and marketing, analytics, email and mailing services, data storage, and security) related to the operation of our business and/or the Services.
- Commercial providers;
- Enterprise accounts, such as your employer.

We may disclose your Personal Information for legal reasons. Specifically, we will share Personal Information with companies, organizations or individuals outside of USA Tech if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- Fulfill any purpose for which you provide it;
- Meet any applicable law, regulation, legal process or enforceable governmental request;
- Enforce applicable Terms of Use, including investigation of potential violations;
- Detect, prevent, or otherwise address fraud, security or technical issues;
- Protect against harm to the rights, property, assets or safety of USA Tech, our customers or the public, content found on the Services, or to protect the Services from unauthorized use or misuse, as required or permitted by law;
- Facilitate a business transfer, such as to a buyer or other successor in the event of merger, acquisition, consolidation, divestiture, change in control, dissolution or other sale or transfer of some or all of USA Tech's assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which Personal Information held by USA Tech about its customers and users will be among the assets to be transferred, and any such successor may use your information for the same purposes set forth in the Privacy Policy.
- For any other purpose disclosed when you provide the information; and,
- When we obtain your consent to do so.

We attempt to notify you about legal demands for your Personal Information when appropriate in our judgment, unless prohibited by law or court order or when the request is an emergency. We may dispute such demands when we believe, in our discretion, that the requests are overbroad, vague or lack proper authority, but we do not promise to challenge every demand.

What if you don't want to provide us with your Personal Information?

Your provision of Personal Information is required in order to use certain parts of our services and our programs. If you fail to provide such Personal Information, you may not be able to access and use our Services and/or our programs, or parts of our Services and/or our programs.

Do we retain your Personal Information?

We may retain your Personal Information for a period of time consistent with the original purpose for collection. For example, we keep your Personal Information for no longer than reasonably necessary for your use of our programs and Services and for a reasonable period of time afterward. We also may retain your Personal Information during the period of time needed for us to pursue our legitimate business interests, conduct audits, comply with our legal obligations, resolve disputes and enforce our agreements.

We retain your Personal Information even after your business relationship with us ends if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse, enforce our Terms of Use, or fulfill your request to “unsubscribe” from further messages from us.

What are your privacy rights and choices?

You may have certain rights relating to your Personal Information, subject to local data protection law. Whenever you use our Services, we aim to provide you with choices about how we use your Personal Information. We also aim to provide you with access to your Personal Information. If that information is wrong, we strive to give you ways to update it quickly or to delete it – unless we have to keep that information for legitimate business or legal purposes. Subject to applicable law, you may obtain a copy of Personal information we maintain about you or you may update or correct inaccuracies in that information by contacting us. To help protect your privacy and maintain security, we will take steps to verify your identity before granting you access to the information. In addition, if you believe that Personal Information we maintain about you is inaccurate, subject to applicable law, you may have the right to request that we correct or amend the information by contacting us as indicated in the How to Contact Us section below.

- Privacy Rights Specific to Californians

Under the California Consumer Privacy Act, California residents have specific rights regarding their Personal Information. This section describes Californians' rights and explains how California residents can exercise those rights.

Below we further outline specific rights which California residents may have under the California Consumer Privacy Act.

- Right to Access Your Personal Information. You have the right to request that we disclose certain information to you about our collection, use and disclosure of your Personal Information over the past twelve (12) months. Any disclosures we provide will only cover the 12-month period preceding the receipt of your request. The response we provide will also explain the reasons we cannot comply with a request, if applicable.
- Right to Data Portability. You have the right to a “portable” copy of your Personal Information that you have submitted to us. Generally, this means you have a right to request

that we move, copy or transmit your Personal Information stored on our servers or information technology environment to another service provider's servers or information technology environment.

- Right to Delete Your Data. You have the right to request that we delete any of your Personal Information that we collected from you and retained, subject to certain exceptions. Once we receive and confirm your verifiable consumer request, we will delete (and direct our service providers to delete) your Personal Information from our records, unless an exception applies.
- Right to Non-Discrimination for the Exercise of Your Privacy Rights. You have the right not to receive discriminatory treatment by us for exercising your privacy rights conferred by the California Consumer Privacy Act.

- Exercising Your Rights

If you are a California resident who chooses to exercise your rights, you can:

1. Submit a request via email to privacy@usatech.com, or
2. Call 1-833-444-USAT (8728) to submit your request.

You may also designate an agent to exercise your privacy rights on your behalf. In order to designate an authorized agent to make a request on your behalf, you must provide a valid power of attorney, the requester's valid government-issued identification, and the authorized agent's valid government issued identification.

- Our Response to Your Request

Upon receiving your request, we will confirm receipt of your request by sending you an email. To help protect your privacy and maintain security, we may take steps to verify your identity before granting you access to the information. In some instances, such as a request to delete Personal Information, we may first separately confirm that you would like for us to in fact delete your Personal Information before acting on your request.

We will respond to your request within forty-five (45) days. If we require more time, we will inform you of the reason and extension period in writing. If you have an account with us, we will deliver our written response to that account. If you do not have an account with us, we will deliver our written response by mail or electronically, at your option.

In some cases, our ability to uphold these rights for you may depend upon our obligations to process your information for security, safety, fraud prevention reasons, compliance with regulatory, contractual or legal requirements, listed below, or because processing is necessary to deliver the services you or one of our business customers have requested. Where this is the case, we will inform you of specific details in response to your request.

We may deny your deletion request if retaining the information is necessary for us or our service providers to:

1. Complete the transaction for which we collected the Personal Information, provide a good or service that you requested, take actions reasonably anticipated within the context of our ongoing business relationship with you, or otherwise perform our contract with you;
2. Detect security incidents, protect against malicious, deceptive, fraudulent, or illegal activity, or prosecute those responsible for such activities;
3. Debug products to identify and repair errors that impair existing intended functionality;

4. Exercise free speech, ensure the right of another consumer to exercise their free speech rights, or exercise another right provided for by law;
5. Comply with the California Electronic Communications Privacy Act (Cal. Penal Code § 1546 *seq.*);
6. Engage in public or peer-reviewed scientific, historical, or statistical research in the public interest that adheres to all other applicable ethics and privacy laws, when the information's deletion may likely render impossible or seriously impair the research's achievement, if you previously provided informed consent;
7. Enable solely internal uses that are reasonably aligned with consumer expectations based on your relationship with us;
8. Comply with a legal obligation; or
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

What is our email policy?

By providing an email address on the USA Tech Sites or Services, you agree that we may contact you in the event of a change in this Privacy Policy, to provide you with any Service related notices, or to provide you with information about our events, invitations, or related educational information.

For purposes of this Privacy Policy, “opt-in” is generally defined as any affirmative action by a User to submit or receive information, as the case may be.

We currently provide the following opt-out opportunities:

1. At any time, you can follow a link provided in offers, newsletters or other email messages (except for e-commerce confirmation or service notice emails) received from us or a USA Tech Partner to unsubscribe from the service.
2. At any time, you can contact us through privacy@usatech.com or the address or telephone number provided below to unsubscribe from the service and opt-out of our right per your consent under the terms of this Privacy Policy to share your Personal Information.
3. At any time, you can reply “STOP” to the message in order to opt-out of receiving SMS texts.

Notwithstanding anything else in this Privacy Policy, please note that we always reserve the right to contact you in the event of a change in this Privacy Policy, or to provide you with any service related notices.

Children's Online Privacy Protection Act Compliance

The Site is not intended for use by children. We do not intentionally gather Personal Information about visitors who are under the age of 16. If a child has provided us with Personal Information, a parent or guardian of that child may contact us to have the information deleted from our records. If you believe that we might have any information from a child under age 16 in the applicable jurisdiction, please contact us at privacy@usatech.com. If we learn that we have inadvertently collected the Personal Information of a child under 16, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

Changes to this Privacy Policy

Our [Privacy Policy](#) may change from time to time. We will not reduce your rights under this Privacy

Policy without your explicit consent. We will post any privacy policy changes on this page and, if the changes are significant, we will provide a more prominent notice (including, for certain services or programs, email notification or privacy policy changes). We will also keep prior versions of this Privacy Policy in an archive for your review.

Contacting Us

If there are any questions regarding this privacy policy you may contact us using the information below:

USA Technologies, Inc.

100 Deerfield Lane, Suite 300

Malvern, PA 19355 USA

Phone: 888-561-4748

Email: privacy@usatech.com Website:

<http://www.usatech.com/>