

Privacy Policy for California Residents

Effective Date: August 27th, 2021

Last reviewed: August 27th, 2021

RVYL Inc. and its mobile applications (collectively referred to as “the ‘Applications,’” “we,” “us,” or “our”) is committed to protecting your personal information and your right to privacy. This Privacy Policy for California Residents (“Policy”) applies solely to visitors, users, and others who reside in the State of California (“consumers” or “you”). We adopt this Policy to comply with the California Consumer Privacy Act of 2018 (“CCPA”). Any terms defined in the CCPA have the same meaning when used in this Policy.

Information We Collect

We collect information that identifies, relates to, describes, references, is capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular consumer or device (“**personal information**”).

Personal information does not include:

- Publicly available information from government records.
- Deidentified or aggregated consumer information.
- Information excluded from the CCPA’s scope, like:
 - health or medical information covered by the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and the California Confidentiality of Medical Information Act (CMIA) or clinical trial data;
 - personal information covered by certain sector-specific privacy laws, including the Fair Credit Reporting Act (FCRA), the Gramm-Leach-Bliley Act (GLBA) or California Financial Information Privacy Act (FIPA), and the Driver’s Privacy Protection Act of 1994.

In particular, our Website has collected the following categories of personal information from consumers in the last twelve 12 months:

Category	Examples
A. Identifiers.	Name, billing or mailing address, unique personal identifier, online identifier, IP address, email address, Social Security number, driver's license number, passport number, government ID number, bank account number, date of birth, or other similar identifiers.
B. California Customer Records Personal	A name, signature, Social Security number, physical characteristics or description, billing or mailing address, telephone number, passport number, driver's license or government

Information categories. (Cal. Civ. Code § 1798.80(e)) .	identification card number, bank account number, credit card number, debit card number, or any other financial information. Some personal information included in this category may overlap with other categories.
C. Protected classification characteristics under California or federal law.	Age (40 years or older) and sex (gender).
D. Commercial information.	Commercial information, including records of products or services purchased, obtained, considered, or other purchasing or consuming histories or tendencies on our Site.
E. Biometric information.	Photograph to validate your identity.
F. Sensory Data	Audio recordings from customer service phone calls.
G. Internet or other similar network activity.	Browsing history, search history, information on a consumer's interaction with a website, application, or advertisement.
H. Geolocation data.	Physical location or movements.
I. Inferences drawn from other Personal Information.	Inferences drawn from any information identified in this subdivision to create a profile reflecting a person's preferences, characteristics, psychological trends, predispositions, behavior, attitudes, intelligence, abilities, and aptitudes.

We obtain the categories of personal information listed above from the following categories of sources:

- **Directly from you.** For example, by visiting our website, filling in forms on our website, or corresponding by phone, email, or otherwise.
- **Indirectly from you.** For example, by use of passive website cookies to observe your actions when you browse pages on our Website.
- **Third-party business partners.** For example, online interactions you may have with our service providers, online identity and fraud verification services, social media sites, and analytics providers.

Use of Personal Information

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, if you ask a question about our services, we will use that personal information to respond to your inquiry. If you provide your personal information to pay for services, we will use that information to process your payment information and provide you with an invoice. We may also save your information to communicate with you.
- Website: To provide, support, personalize, and develop our Websites, products, and services, including the delivery of content, product and service offerings and targeted offers via email or text message (with your consent, where required by law).
- Fraud and Security Purposes: To create, maintain, customize, and secure your account with us and to process your requests, purchases, transactions, and payments and prevent transactional fraud. To also help maintain

the safety, security, and integrity of our Websites, products and services, databases and other technology assets, and business.

- Service and Support: To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- Legal and Regulatory Requirements: To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To manage the day-to-day business needs including, but not limited to, payment processing and financial account management, business planning and forecasting, security and fraud prevention, and compliance with legal and regulatory obligations.
- To gather broad demographic information and to monitor the level of activity on our Site.

We will not collect additional categories of personal information or use the personal information we collected for materially different, unrelated, or incompatible purposes without providing you notice.

Sharing Personal Information

We may disclose your personal information to a third party for a business purpose. When we disclose personal information for a business purpose, we enter a contract that describes the purpose and requires the recipient to both keep that personal information confidential and not use it for any purpose except performing the contract.

Disclosures of Personal Information for a Business Purpose

In the preceding twelve (12) months, we have disclosed the following categories of personal information for a business purpose:

Category
A. Identifiers
B. California Customer Records Personal Information categories.
C. Protected classification characteristics under California or federal law.
D. Commercial information.
E. Biometric information.
F. Sensory Data
G. Internet or other similar network activity.
H. Geolocation data.
I. Inferences drawn from other Personal Information.

We disclose your personal information for a business purpose to the following categories of third parties:

- Service providers.
- Third parties to whom you or your agents authorize us to disclose your personal information in connection with our Services.
- Social networks
- Merchants
- Partners
- Government agencies including to support regulatory and legal requirements.

Sales of Personal Information

In the preceding twelve (12) months, we have not sold personal information.

Your Rights and Choices

If you are a California resident, you have the right to request that we:

1. Disclose to you the following information covering the 12-month period prior to your request (“Access Request”):
 - The categories of personal information we collected about you.
 - The categories of sources for the personal information we collected about you.
 - Our business or commercial purpose for collecting that personal information.
 - The categories of third parties with whom we share that personal information.
 - The specific pieces of personal information we collected about you.
2. Delete any of your personal information that we collected from you and retained, subject to the following exceptions:
 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.
9. Make other internal and lawful uses of that information that are compatible with the context in which you provided it.

Exercising Access, Data Portability, and Deletion Rights

To exercise the access, data portability, and deletion rights described above, please submit a verifiable consumer request to us by either:

- Calling us at 619-930-5500, or
- Emailing us at info@ryvyl.com

Only you, or someone legally authorized to act on your behalf, may make a verifiable consumer request related to your personal information. You may also make a verifiable consumer request on behalf of your minor child.

You may only make a verifiable consumer request for access or data portability twice within a 12-month period. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an authorized representative.
- Describe your request with sufficient detail that allows us to understand, evaluate, and respond to it properly.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

Making a verifiable consumer request does not require you to create an account with us. However, we do consider requests made through your password protected account sufficiently verified when the request relates to personal information associated with that specific account.

We will only use personal information provided in a verifiable consumer request to verify the requestor's identity or authority to make the request.

Response Timing and Format

We endeavor to respond to a verifiable consumer request within forty-five (45) days of its receipt. If we require more time (up to 90 days), 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.

Any disclosures we provide will only cover the 12-month period preceding the verifiable consumer request's receipt. The response we provide will also explain the reasons we cannot comply with a request, if applicable. For data portability requests, we will select a format to provide your personal information that is readily useable and should allow you to transmit the information from one entity to another entity without hindrance.

We do not charge a fee to process or respond to your verifiable consumer request unless it is excessive, repetitive, or manifestly unfounded. If we determine that the request warrants a fee, we will tell you why we made that decision and provide you with a cost estimate before completing your request.

Non-Discrimination

We will not discriminate against you for exercising any of your CCPA rights. Unless permitted by the CCPA, we will not:

- Deny you goods or services.
- Charge you different prices or rates for goods or services, including through granting discounts or other benefits, or imposing penalties.
- Provide you a different level or quality of goods or services.
- Suggest that you may receive a different price or rate for goods or services or a different level or quality of goods or services.

However, we may offer you certain financial incentives permitted by the CCPA that can result in different prices, rates, or quality levels. Any CCPA-permitted financial incentive we offer will reasonably relate to your personal information's value and contain written terms that describe the program's material aspects. Participation in a financial incentive program requires your prior opt-in consent, which you may revoke at any time.

Other California Privacy Rights

California's "Shine the Light" law ([Civil Code Section § 1798.83](#)) permits users of our Websites that are California residents to request certain information regarding our disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to info@ryvyl.com.

Changes to Our Privacy Policy

We reserve the right to amend this privacy Policy at our discretion and at any time. When we make changes to this Policy, we will post the updated Policy on the Website and update the Policy's effective date. Your continued use of our Websites following the posting of changes constitutes your acceptance of such changes.

Contact Information

RVYVL Inc. Privacy Policy for California Residents

If you have any questions or comments about this Policy, the ways in which we collect and use your information described above, your choices and rights regarding such use, or wish to exercise your rights under California law, please do not hesitate to contact us at:

Phone: 619-930-5500

Website: <https://www.rvvy.com/>

Email: info@rvvy.com

Postal Address: 3131 Camino Del Rio North, Suite 1400, San Diego, CA 92108

Please contact our team if you need to access this Policy in an alternative format due to having a disability.