

Privacy Policy

Our Privacy Commitment

1. FreePay Inc (“FreePay”, “we”, “us” or “our”) provides a range of products and services (“Services”) to users (“Users”, “you” or “your”).
2. FreePay is committed to protecting the privacy of all Users of our Services.
3. Our Privacy Policy applies to Users who use our Services. Together with any additional terms, including requirements which apply to a particular Service or group of Services, it is also part of our Terms of Use.
4. By using, including visiting, any of our Services, you agree that your use of the Services is governed by our Terms of Use, including this Privacy Policy, which are legally binding.
5. Where, through any of our Services, a third-party has made a product or service available to download or use, the privacy policy of that third-party applies and our Privacy Policy does not apply. Similarly, where a link from any of our Services to a third-party product or service is followed, the privacy policy of that third-party applies and our Privacy Policy does not apply. Third parties are responsible for providing information to you about their own privacy practices.
6. If you have an express written agreement between yourself and FreePay and the terms of that agreement are inconsistent with this Privacy Policy, then the terms of that agreement prevail to the extent of any inconsistency.

Information we collect

7. We collect information to provide Services to our Users.
8. We collect information in many ways including:
 - (a) from the information you give us – for example:
 - (i) when you register as a User or request a specific Service we ask for your personal information such as your name and email address – you might also opt to give us additional personal information such as your employer, job title or industry
 - (ii) when you complete any FreePay User profile you might give us more personal information such as your telephone number, address or employer
 - (iii) when you submit a query or comment to us or the public through any of our Services
 - (iv) when you purchase something from us, we might require you to give us your billing information such as credit card details and credit history
 - (v) when you purchase, or consider purchasing, something from us on behalf of a company or other organization, we might require you to give us information about that company or organization
 - (vi) if you enter into a Royalty Agreement with us, we might require you to give us your payment information such as your bank account details so that we can pay royalties
 - (b) by recording information we get (from our own Services, software running on your device or third-party services you have set up) when you use our Services – for example:



- (i) which Services you use and how you use them, including usage data, which links you click on, what searches you submit
 - (ii) how you access our Services
 - (iii) devices you use to access our Services, including internet protocol address
 - (iv) error reports
 - (v) your location, operating system and type of web browser
 - (c) from third parties we use – for example:
 - (i) social media such as linked in and twitter
 - (ii) marketing, promotional and advertising providers
 - (iii) financial facilitators such as payment gateways
 - (iv) web hosting and email providers
 - (d) from publicly available sources
9. The third party service providers and publicly available sources from which we receive information about you may be located anywhere in the world.
10. Where we collect information from third party service providers, the information varies and is controlled by that service provider or as authorized by you via your privacy settings at that service provider.

How we use information we collect

11. The information we collect is shared with and used by FreePay to:
- (a) provide Services to you
 - (b) respond to requests or queries we receive from you
 - (c) help us recognize you across different Services
 - (d) maintain contact with you
 - (e) seek your feedback
 - (f) learn about your interests on our Services
 - (g) improve your experience
 - (h) increase security
 - (i) measure use and effectiveness of our Service
 - (j) let you know about Services you may be interested in
 - (k) purposes related to the above

Information you share

12. We encourage our Users to use our Services to support each other by sharing information and content with the FreePay community through public forums including those offered as part of our Services as well as social media. Any content, including personal information, you choose to submit to any such public forum may be read, collected by or used by others who use these forums. FreePay is not responsible for the information you choose to submit to a public forum, or for any subsequent use, misuse or misappropriation of your personal information.

Information we share

13. We do not collect sensitive personal information, unless you choose to submit it to a public forum in which case you provided your consent to share it.



14. We may share personal information outside FreePay if:
 - (a) we have received your consent, including implied, to share it
 - (b) one of our third-party service providers needs the information to provide a Service to you on our behalf
 - (c) there is a change in control or sale of assets of any part of FreePay and the information is required to be shared as part of, or in preparation for, any of these events, in which case the third-party information recipient will have the right to continue to use the information provided to us in the manner set out in our Privacy Policy
 - (d) we are required by law to share the information
 - (e) we reasonably believe that use or disclosure of the information is necessary to protect our rights and/or to comply with a judicial proceeding, court order or legal process
15. We do not disclose personal information to anyone otherwise than in accordance with our Privacy Policy. However, we may share non-personally identifiable information for research or promotional purposes, including publicly.

Cookies, IP addresses and other technologies

16. When you access our websites or social media, we may use software embedded into software (such as Javascript) and we may place cookies on your computer or other device to collect your personal information or information about the searches you conduct, links you click on, pages you view, how you reach them, what you do when you reach a page, the length of time you remain on a page, the web browser and browser language you use, the device you use, device events and how we perform in providing Services to you. This enables us, our third-party hosts or service providers to recognize your computer and greet you each time you visit. It may also assist us in keeping track of Services you use so that we can send you news about our Services. We may also use cookies to measure traffic patterns to determine which areas of our websites or social media have been visited and to measure transaction patterns in the aggregate. We use this to research our Users' habits so that we can improve our Services. If you do not wish to receive cookies, you can set your browser so that your electronic device does not accept them. By using our Services, you consent to the placement of cookies in your browser and HTML-based emails.
17. We may also collect your internet protocol address to analyze trends, administer our websites, track Users' movements and gather broad demographic information. This information does not identify you personally.

Security and international transfer

18. We use robust security measures to protect FreePay and our Users from unauthorized access to and unauthorized alteration, disclosure or destruction of information we hold. In particular:
 - (a) we encrypt all communications streams, for Services provided directly by FreePay, with a minimum of SSL
 - (b) we review our information collection, storage and processing practices, including physical security measures, to guard against unauthorized access to systems
 - (c) we restrict access to personal information to FreePay employees, contractors and agents who need to know that information in order to process it for us, and who are subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations
19. To facilitate the provision of our global Services, we may transfer and process information around the world.



How you can access your personal information

20. You may request access to any personal information we hold about you at any time by contacting us by email. Where we hold personal information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge you for simply making the request, nor charge you for making any corrections to your personal information.
21. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, would result in a breach of confidentiality, is contrary to natural justice or is prohibited by law. If this happens we will tell you when you request access to it.
22. If you believe that the personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.
23. You are entitled to ask us to erase your personal information or restrict its processing. These rights are limited in some circumstances – for example if we have a legal requirement to process your personal information. In some instances, this may mean that we may retain some of your personal information even if you withdraw your consent.

Policy Changes, Complaints and Contacting Us

24. We may change our Privacy Policy from time to time. You should regularly check for changes to our Privacy Policy.
25. You agree to be bound by any such changes if you continue to use any Service after such changes have been posted. If you do not agree to the changed Privacy Policy, you must discontinue your use of the Service.
26. If you have questions, comments or complaints about our Privacy Policy or an interference with your privacy, please contact us by emailing legalnotices@freepaytx.com
27. We will treat your complaint confidentially and a representative will contact you to discuss your concerns and options regarding how to resolve your complaint in a timely and appropriate manner.

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