

This Online Privacy Statement was last updated on **September 1, 2017**

Online Privacy Statement

Overview

Custom House USA, LLC and Western Union Business Solutions (USA), LLC (alternately, “Western Union Business Solutions”, “WUBS”, “we”, “us” or “our”) respects your privacy and is committed to complying with this privacy policy (“Online Privacy Statement”), which describes what information we collect about you, including how we collect it, how we use it, with whom we may share it and what choices you have regarding our use of your information. This Online Privacy Statement applies to information collected on our website located at <http://business.westernunion.com/> (the “Website”), any current or future mobile applications associated with the Website (the “Mobile Applications”), all interactive features, applications, widgets, social networks and social network “tabs”, and other online or wireless offerings that post a link to this Online Privacy Statement, whether accessed via computer, mobile device or other technology or any associated content, material, or functionality contained on the Website or Mobile Application (collectively, the “Services” and, together with the Website and the Mobile Application, the “System”). By accessing and using the System, or any part thereof, you agree that you have read and understand this Online Privacy Statement, and that in exchange for access to the System, you accept and consent to the privacy practices (and any uses and disclosures of information about you) that are described in this Online Privacy Statement. The U.S. Consumer Privacy Notice, which applies to U.S. customers and consumers as described in that notice, may apply in addition to the terms of this Online Privacy Statement. In the event that the Consumer Privacy Notice is applicable but conflicts with any terms of this Online Privacy Statement, the Consumer Privacy Notice shall govern with respect to those conflicting provisions.

Changes to our Online Privacy Statement

We may change this Online Privacy Statement at any time and from time to time. The most recent version of the Online Privacy Statement is reflected by the version date located at the top of this Online Privacy Statement. All such updates and amendments are effective immediately upon notice thereof, which we may give by any means, including, but not limited to, by posting a revised version of this Online Privacy Statement or other notice on the System. You should view this Online Privacy Statement often to stay informed of changes that may affect you, as your continued use of the System signifies your continuing consent to be bound by this Online Privacy Statement. We expressly reserve the right to make any changes to this Online Privacy Statement at any time, without prior notice to you. The current version of this Online Privacy Statement is posted here: <http://business.westernunion.com/>. On each respective date you visit the System this Online Privacy Statement shall be the Online Privacy Statement applicable to your access and use of the System on that date. Our electronically or otherwise properly stored copies of this Online Privacy Statement shall be deemed to be the true, complete, valid, authentic, and enforceable copy of the version of this Online Privacy Statement which were in force on each respective date you visited the System. This Online Privacy Statement is not intended to and does not create any contractual or other legal right in or on behalf of any party other than Western Union Business Solutions.

What Information Do We Collect?

As described in detail below, we may collect certain identifying information from or about you in connection with your use of, or your submissions to, the System (collectively, the “Collected Information”). Collected Information includes, without limitation, any information that may be used to identify an individual, including, but not limited to, a first and last name, a home, business, or other physical address,

business name, a phone number, an email address, employer name, and employer information (i.e., employer address and other identifying information). Western Union Business Solutions uses the information we collect to provide the Western Union Business Solutions Services that are available via the System. In order to continuously improve your service and tailor our subsequent communications to you, we may also ask you to provide us with additional information regarding your demographics, comments, professional interests, and contact preferences.

Cookies and Usage Reports

By placing a small file known as a "cookie" on your computer (or other device), Western Union Business Solutions and its third party service providers' servers passively gather information about all visitors' use of the System for several reasons, including, but not limited to, the following: statistics collection and analysis, System optimization, analytics (as described below), market research, and maintenance of user login information. The information that we and our third party service providers track with cookies includes, but is not limited to, the type of browser (such as Google Chrome or Internet Explorer) and Internet-connected devices being used to access the System, your Internet protocol ("IP") address, your home domain or Internet service provider, your referrer URL (which is the URL for the website that you were viewing prior to visiting the System), how you were directed to the System, which specific pages you access on the System, how long you view each page, the time and date you access our System and the total number of visitors to the System and any portions thereof. We, and/or our third party service providers, may use the information collected from cookies or similar files on your computer for security purposes (such as authentication), to facilitate site navigation and to personalize your experience while visiting the System. This data helps us and our third party service providers improve our respective product and services.

Most popular Internet browser applications will allow you to configure the browser so as not to accept cookies. However, setting your browser to reject cookies may, in certain instances, prevent you from taking full advantage of the System (or some portion thereof) and its capabilities, or cause some features of the System to function improperly or more slowly.

Google Analytics and Web Beacons

Our Website may use Google Analytics, a web analysis service provided by Google, in order to better understand your use of our Website and how we can improve them. Google Analytics collects information such as how often users visit a website, what pages you visit when you do so, and what other websites you used prior to coming to such website. Google Analytics collects only the IP address assigned to you on the date you visit a website, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with your personal information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit a website, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to Western Union Business Solutions Website is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). Google utilizes the data collected to track and examine the use of the Western Union Business Solutions Website, to prepare reports on its activities and share them with other Google services. Google may use the data collected on the Western Union Business Solutions Website to contextualize and personalize the ads of its own advertising network. To more fully understand how Google may use the data it collects on the Western Union Business

Solutions Website, please review “How Google uses data when you use our partners' sites or apps,” (located [here](#) or any successor URL).

Some of the areas of the System may contain electronic images known as web beacons (sometimes known as clear gifs) that allow Western Union Business Solutions, and its third party providers or affiliates, to count and track users who have visited certain portions of the System. Web beacons collect only limited information and do not collect any of your personal information. Specifically, Western Union Business Solutions may use a type of web beacon known as a “retargeting pixel,” which will allow users to receive targeted advertising from Western Union Business Solutions via certain social media websites, including Facebook.com.

Correspondence

We appreciate your questions and comments about the System and welcome your messages at our “Contact Us” page, which you can find here <http://business.westernunion.com/>. If you correspond with Western Union Business Solutions through the System or via email, the Collected Information may include the content of, and metadata regarding, any correspondence you may have with us. We may share your messages with those within our organization who are most capable of addressing the issues contained in your message. We may archive your message for a certain period of time or discard it.

How Can I Opt-Out of Promotional Correspondence?

We may send you emails with promotional offers only if you opt-in to receiving such emails. If you would no longer like to receive information, newsletters or other promotional messages from us, please click the link at the bottom of any such email you receive from us and follow the instructions, or alternatively you may contact us at:

Western Union Business Solutions – Online Service Customers:

- In-country: 1-866-430-6386
- From outside: 1-732-694-2257
- By email: online@westernunion.com

Western Union Business Solutions – Corporate Customers:

- wubspivacy@westernunion.com

with the word “UNSUBSCRIBE” or “REMOVE” in the subject line. Your email address will be removed from our marketing list. Please allow us a reasonable period of time in order to satisfy your request, as some promotions may already be in process.

Online Account Management

If you elected to subscribe to any online services provided via the System, including the ability to access any password-protected areas of the System, you will be required to submit personal information (including some Collected Information) for the purpose of verifying your identity and your authority to manage the

account. This Collected Information will be used exclusively by Western Union Business Solutions, our agents, suppliers and third-party service providers for internal use and to respond to your service requests.

How Do We Use The Information That We Collect?

Western Union Business Solutions and our third party services providers collect and use the Collected Information to operate the System and deliver the Services, including to provide certain services and to improve the user experience, address System integrity or security issues, and conduct research and analysis to maintain, protect, develop, and improve the System and, additionally, use any information submitted by users as described below or elsewhere in this Online Privacy Statement. We may send you information that you request from us, promotional materials regarding Western Union Business Solutions, and any other communication for any other legitimate and lawful business purposes. Additionally, we may retain and use certain Collected Information to facilitate and otherwise address certain inquiries or requests regarding the Services or the System, or respond to your questions or requests for information about or from Western Union Business Solutions. We may also use Collected Information as necessary to ensure compliance with any Western Union Business Solutions policies and any applicable law, regulation or order.

Except as set forth in this Online Privacy Statement, Western Union Business Solutions will not use, disclose, or transfer your Collected Information unless:

- (1) you expressly authorize Western Union Business Solutions to do so,
- (2) it is necessary to allow Western Union Business Solutions' service providers, agents, or other third parties to provide products or services for or to Western Union Business Solutions,
- (3) it is necessary in order to provide the System or the Services,
- (4) Western Union Business Solutions is sending you other information that may be useful to you,
- (5) subject to applicable contractual or legal restrictions, it is disclosed to entities that perform marketing services on Western Union Business Solutions behalf or to other entities with whom Western Union Business Solutions has joint marketing agreements,
- (6) it is necessary to protect the confidentiality or security of your records,
- (7) it is necessary in connection with other business purposes including, without limitation, verifying identity, age, investigating complaints about the System, risk assessment, security, fraud and crime prevention/detection, monitoring, research and analysis, marketing, customer purchasing preferences and trends and dispute resolution,
- (8) it is necessary to comply with law enforcement, governmental mandate, or other legal requirement, if appropriate, for your protection or in connection with an investigation or prosecution of possible unlawful activity;
- (9) subject to applicable contractual or legal restrictions, it is necessary in connection with a sale of all or substantially all of the assets of Western Union Business Solutions or the merger of Western Union Business Solutions into another entity or any consolidation, share exchange, combination, reorganization, or like transaction in which Western Union Business Solutions is not the survivor, or
- (10) it is otherwise necessary for Western Union Business Solutions to disclose it as required or permitted by law.

With Whom Do We Share Information That We Collect?

In addition to information sharing described elsewhere in this Online Privacy Statement, we may also disclose Collected Information if we become subject to a subpoena or court order, or if we are otherwise legally required to disclose information. We may also use and disclose Collected Information to establish or exercise our legal rights, to assert and defend against legal claims, or if we believe such disclosure is necessary to investigate, prevent, or take other action regarding actual or suspected illegal or fraudulent activities or potential threats to the physical safety or well-being of any person.

It is possible that Western Union Business Solutions corporate structure or organization might change or that it might merge or otherwise combine with, or that it or portions of its business might be acquired by, another company. In any such transactions, customer information generally is, and should be expected to be, one of the transferred business assets. Also, if any bankruptcy or reorganization proceeding is brought by or against us, your information may be considered a company asset that may be sold or transferred to third parties.

What Choices Do You Have?

When submitting information, corresponding, making requests for information, and otherwise interacting with Western Union Business Solutions and its representatives through or in connection with the System, you choose what information to supply or submit, whether you wish to receive further information, and how you may be contacted. Please take care to share only such information as is needed or that you believe is appropriate. Any promotional email we send to you will contain a link which will allow you to opt out of receiving any further correspondence.

How Do We Protect Information Collected About You?

Western Union Business Solutions takes commercially reasonable measures to secure and protect information transmitted via or stored on the System. Nevertheless, no security system is impenetrable. We cannot guarantee that information that users of the System may happen to transmit or otherwise supply will be totally secure.

Linked Websites

For your convenience, hyperlinks may be posted on the System that link to other websites not under our control. We are not responsible for, and this Online Privacy Statement does not apply to, the privacy practices of those sites or of any companies that we do not own or control. We cannot be responsible for the privacy practices of any such websites or pages not under our control and we do not endorse any of these websites or pages, the services or products described or offered on such sites or pages, or any of the content contained on those sites or pages. We encourage you to seek out and read the privacy policy of each website that you visit. In addition, should you happen to initiate a transaction on a website that our System links to, even if you reached that site through the System, the information that you submit to complete that transaction becomes subject to the privacy practices of the operator of that linked website. You should read that website's privacy policy to understand how personal information that is collected about you is used and protected.

Social Media Platforms and Websites

Any Submission that you submit to any of our pages contained on a social media platform or website by e-mail, posting, messaging, uploading, downloading, or otherwise is done at your own risk and without any

expectation of privacy. We cannot control the actions of other users of a social media platform and we are therefore not responsible for any Submissions contained on a social media platform or website. By visiting any of our pages that are contained on any social media platform or website, you are representing and warranting to us that you have reviewed the applicable privacy policy and terms of use of such website or social media platform and that you will abide by all such provisions contained therein.

Children

The System is intended for a general audience and is not intended for use or view by children under 13 years of age without parental consent, and we do not knowingly collect information about children. Consistent with the Children's Online Privacy Protection Act, we will not knowingly collect any information from children under the age of 13. If you are under the age of 13, you must ask your parent or guardian to assist you in using the System. Furthermore, we may restrict entries to any contests, sweepstakes or promotions to entrants who are at least 18 years of age. For children under the age of 13 to participate in a trip or activity offered through the System, such child's parent or guardian must provide the information necessary for that child to participate in such trip or activity.

Visiting The System From Outside The United States

If you are visiting the System, or any part thereof, from outside of the United States of America, please be aware that your information may be transferred to, stored or processed in the United States, where our servers are located. The data protection and other laws of the United States and other countries might not be as comprehensive as those in your country, but please be assured that we take steps to protect your privacy. By using any portion of the System, you understand and consent to the transfer of your information to our facilities in the United States and those third parties with whom we share it as described in this Online Privacy Statement.

Do Not Track Requests

California and Delaware laws require that we indicate whether we honor "Do Not Track" settings in your browser concerning targeted advertising. "Do Not Track" is a standard that is currently under development. As it is not yet finalized, we adhere to the standards set out in this Online Privacy Statement and do not monitor or respond to any Do Not Track browser requests.

Whom Can You Contact For More Information?

If you have any questions or suggestions about the System, Western Union Business Solutions services, or our privacy practices, please contact us through the Contact Us form located at: <http://business.westernunion.com/>

Acknowledgement

BY ACCESSING OR USING THE SYSTEM, OR ANY PORTION THEREOF, YOU ACKNOWLEDGE THAT YOU HAVE READ, UNDERSTAND, AND CONSENT TO THE ONLINE PRIVACY STATEMENT, AND TO THE USES AND DISCLOSURES OF COLLECTED INFORMATION ABOUT YOU, THAT ARE DESCRIBED IN THIS ONLINE PRIVACY STATEMENT.