

Privacy Policy

Introduction

WisePay is a member of the Community Brands family. This Privacy Policy (“Privacy Policy”) is specific to WisePay and may contain information not included in Community Brands’ statement. This is due to the specific services and software uniquely provided by WisePay. Please also review the Community Brands Privacy Policy to ensure you are fully informed of our privacy practices. The Community Brands Privacy Policy can be found here:

<https://www.communitybrands.com/legal/>.

At WisePay (“WisePay”, “we”, “us”, “our”, or the “Company”), we are committed to protecting your privacy. This Privacy Policy describes the types of information we collect about users of our websites and is designed to help you understand how we collect, use and safeguard the information you provide to us and to assist you in making informed decisions when using our Services. This Privacy Policy also describes (1) the measures we take to safeguard the information we collect and (2) your rights and privileges concerning our collection, use and disclosure of information about you.

This Privacy Policy applies to websites owned and operated by WisePay, including, but not limited to, www.wisepay.co.uk. Throughout this document, this website, all other WisePay affiliated websites, and affiliates with links to this policy will be collectively referred to as the “Websites”. Services provided by or enabled via the Websites will be referred to as the “Services”.

WisePay is not responsible for the content or privacy practices of non- WisePay websites to which this website, or any other WisePay website, may link. Also, WisePay is not responsible for the privacy practices of our Clients or users of our Clients’ websites. You should review any additional privacy policy and terms of use agreements before using a Client’s website.

By using our Websites, you consent to the data practices described in this Privacy Policy. If you do not agree with the data practices described in this Privacy Policy, you should not use our Websites.

WisePay Platform

In addition to the Websites, WisePay provides payment, booking, and communication software to educational organisations for their students, staff, parents, external individuals and companies to use.

The use of information collected through this software is strictly limited to the purpose of meeting our contractual obligations to our Clients and providing the services requested by our Clients, which are defined within our service agreements. The information we collect is provided directly from clients such as schools and colleges, or is provided to us directly by individual Users of our services.

If you are the customer of one of our Clients, you should refer to that Client's privacy policy for information on how your personal information is collected, used and protected. Any inquires related to your data, how it is processed, and data access, deletion and modification requests should be directed to that Client.

Changes to the Privacy Policy

The data WisePay collects and uses is governed by this Privacy Policy as amended from time to time, not by the Privacy Policy in effect at the time of data collection. This includes data collected from WisePay Websites, affiliates with links to this Privacy Policy, and services provided by or enabled via these sites. WisePay may change the Privacy Policy at our sole discretion and will provide notice of changes in the Privacy Policy and on the privacy policy page of our Websites. If, as the result of such changes, you want to alter the ways in which we are allowed to use your personal information, you can do so by following the procedure described in the section entitled "Privacy Rights".

Please regularly review our Privacy Policy. **If you have objections to the Privacy Policy, you should immediately discontinue use of the Websites and the Services enabled by the Websites.** This Privacy Policy does not govern privacy practices associated with offline activities, websites other than the Websites, or any products or services not available or enabled via the Websites.

You will be deemed to have been made aware of, and will be subject to, the changes to the Privacy Policy after such notice has been posted with the following exception: if at the time you provide personal information to WisePay you limit how such information will be used to communicate with you, either by WisePay or by third parties, WisePay will not change your preference in this regard without your express consent.

Policy Regarding Children

WisePay Websites and Services are not designed for use by children under the age of 16. As such, this Website is not directed at children under the age of 16 nor do we knowingly collect or maintain information directly from children under the age of 16 on this Website.

Collection and Use of Data

Personal data is provided to WisePay either directly from a client such as a school or college or is provided directly to us by individual Users of our Services. The data that WisePay collects is dependent upon the Services WisePay is providing to each User. WisePay may collect personal data from each User when they:

- use any of WisePay's Services;
- register to any of WisePay's Services;
- have their data in a client school's or college's Management Information System;
- are included in a client school's or college's meal service;
- contact WisePay directly; or
- use our web site.

If you are a User of WisePay who is providing personal data about somebody else to WisePay, you must ensure that you are authorised to provide WisePay such data and have the individual consent of each person to share their personal data with WisePay, without WisePay needing to carry out further processes under the data protection or privacy laws.

Unless you ask us not to, we may contact you via email in the future to tell you about our services, new products, or changes to this privacy policy or to provide you with informational or educational newsletters.

Personal Information and Business Information

"Personal Information" as used in this Privacy Policy is information that we directly associate with a specific person or entity, such as name, address, payment information (including payment card number, expiration date, cardholder name and CVV code), mobile telephone number, and email address. Please note that any payment information we collect is not stored by us.

The Personal Information you provide will vary based upon the context, and we will not collect your Personal Information unless you make it available. You are not required to provide Personal Information at any time while visiting the Websites; however, you may be required to provide Personal Information to use certain Services. You may provide us with Personal Information by participating in online surveys, subscribing to newsletters and other recurring offerings through the Websites, and in connection with other products, services, features, or requests made available through the Websites.

WisePay collects the Business Information necessary to enable us to respond to your requests for our products and services and to send you information regarding our products and services from time to time. Since most of the users of our products and Websites are doing so in their capacity as employees or companies, most Business Information we collect will be in that

capacity (rather than information about you individually, such as your personal tastes, etc.). For these purposes, we have defined “Business Information” as any information that identifies or may identify a company or an individual contact at a company or that allows others to contact a company or an individual contact at a company. When you visit our Websites, you may be asked to submit information such as e-mail address, company name, address, phone number, your product version and/or areas of interest. We may also ask you where you heard about our company or products, or for other information that will help us understand more about your needs or help us process your requests for information. In addition, we collect credit card and related payment information when you order products, services or support plans online. Our information collection and use practices are described in more detail below.

Support

We offer support services limited to email and phone support. If you utilise our support, you may be asked for information such as name service used, and other information to help us determine what the technical issues are and how best to help you resolve them.

Service-Related Information Collection

WisePay collects certain additional information in connection with your use of our Services. For instance:

- **Account Set-Up and Access:** Upon subscribing to our services, WisePay collects Information, which may include details such as, contact information. This allows us to process your enrollment request and to identify you to authorise your access and use of the services, and to provide you with your relevant account information..
- **Web-based Services:** Some of our web-based Services collect certain additional information, including IP address, browser, , domain, and other environment-related information. This enables us to provide a secure environment for the use of the services and calculate aggregate statistical information about the customers using these services. We use this information to better protect you and to provide a better user experience.

Public Forums

Information (including personal and business information) that you submit, post or otherwise reveal in a public forum (such as comments to a blog or product discussion forum) is not subject to this Privacy Policy, will be seen by third parties not related to WisePay and may be used by them or WisePay to contact you for any purpose.

Registrations

To access information (blogs, demos of our products, marketing materials etc.) on the Websites, a user may be required to register with WisePay. During registration a user is required to give certain information (such as name, email address, job title). This information is used to contact you about the products/services on our site in which you have expressed interest.

Surveys and Contests

From time-to-time, our Websites may request information via surveys or contests. Participation in these surveys or contests is completely voluntary and you may choose whether or not to participate and therefore disclose this information. Information requested may include contact information (such as name and shipping address), and demographic information (such as zip code). Contact information will be used to notify winners and award prizes, if applicable. Survey information will be used for purposes of monitoring or improving the use and satisfaction of the Websites.

Cookies

WisePay may place “cookies” on the browser of your computer. Cookies are small pieces of information that are stored by your browser on your computer’s hard drive. Cookies may enhance the convenience and use of the Website. For example, the information provided through cookies may be used to recognise you as a previous user of the Website (so you do not have to enter your personal information every time), offer personalised information for your use, and otherwise facilitate your experience using the Website. You may choose to decline cookies if your browser permits, but doing so may affect your ability to access or use certain features of the Website.

WisePay may also utilise web beacons on our Websites. A “web beacon,” also known as an Internet tag, pixel tag or clear GIF, links web pages to web servers and their cookies and may be used to transmit information collected through cookies back to a web server. The information collected through these automated means may include information that we gather and store about your visit to, and use of, the Websites, such as your IP address, type of browser and operating system used, date and time you access the websites, pages you visit, and, if you linked to the Websites from another website, the address of that website. This data does not include Personal Information and is not treated as Personal Information under this Privacy Policy, but it may include the IP address of your device. We may link an IP address to information that is personally identifiable.

Most web browsers automatically accept cookies, but you can disable this function so that your browser will not accept cookies. Please be aware that disabling this function may impact your use and enjoyment of this Website.

Third-Party Analytics

We may also allow certain third-party analytics service providers to include cookies and web beacons within the pages of the Websites on our behalf and to retain and use the information received from such cookies and web beacons themselves. Third-party service providers that collect this data on our behalf may offer information about their data collection practices.

Do Not Track

Currently, various browsers — including Microsoft Edge, Google Chrome, Internet Explorer, Mozilla Firefox, and Apple Safari — offer a “do not track” or “DNT” option that relies on a technology known as a DNT header, which sends a signal to Web sites’ visited by the user about the user’s browser DNT preference setting. We do not currently commit to responding to browsers’ DNT signals with respect to the Company’s Web sites, in part, because no common industry standard for DNT has been adopted by industry groups, technology companies or regulators, including no consistent standard of interpreting user intent. We take privacy and meaningful choice seriously and will make efforts to continue to monitor developments around DNT browser technology and the implementation of a standard.

Protecting Data During Collection

We take precautions to protect your information. We use appropriate security measures to protect the security of your data both online and offline. These measures vary based on the sensitivity of the information that we collect, process, store, and the current state of technology. Please note, though, that no website or internet transmission is completely secure, so while we strive to protect your data, we cannot guarantee that unauthorised access, hacking, data loss or a data breach will never occur.

How We Use The Data We Collect

WisePay will only use personal data to enable us to meet our legal obligations of the contract with your school, college or organisation. We will only use personal data to perform or improve our Services to our Users.

Any personal data a User submits to WisePay directly, or which is submitted to WisePay by an organisation on behalf of the User, will only be disclosed and used within WisePay’s group. WisePay does not use personal data for the purpose of marketing Users.

Email Communication

We send notification emails about the Website and Services from time to time as necessary. Generally, you may not opt-out of these communications, which are not promotional in nature. If

you do not wish to receive them, you have the option to deactivate your account. We do not send promotional emails.

How We Share Data

Unless you give us your permission, we don't share data we collect from you with third parties, except as described below:

If a User makes use of WisePay's payment services, WisePay will need to share certain data with 3rd party payment processors in order for us to fulfil the payment process.

If your school or college has requested that WisePay interacts with your school or college's catering tills, or your school or college's catering provider, then WisePay will share specific details on your meal payments with these providers.

Where you are making payments or bookings with your school or college facilitated by WisePay, all details of these payments and bookings, including any refunds, will be made available to your school or college.

Privacy Rights

We may retain your information for a period of time consistent with the original purpose of collection. For instance, we may retain your information during the time in which you have an account to use our Web sites or Services and for a reasonable period of time afterward. We also may retain your 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.

You may opt out of any future contacts from us at any time. Additionally, if the collection of your personal data was based on your consent, you have the right to revoke that consent at any time. Be aware that by revoking consent, you may lose access to services you previously opted to use.

You may request to review, correct, delete, or otherwise modify any of the personal information that you have previously provided to us through the Company's Web Site(s) and Services. You can do the following at any time by contacting us via the email address or phone number provided on our website:

- See what data we have about you, if any
- Change/correct any data we have about you
- Have us delete any data we have about you
- Express any concern you have about our use of your data

Requests to access, change, or delete your information will be addressed within a reasonable timeframe.

How to Contact Us

WisePay commits to resolve complaints about our collection or use of your personal information. WisePay takes its users' privacy concerns seriously.

If you believe that WisePay has not complied with this Privacy Policy with respect to your personal information, you should first contact us at WisePay by emailing us at privacy@wisePAY.co.uk or by writing to the WisePay Privacy Officer at the following address:

Community Brands
Attn: Privacy Officer
9620 Executive Centre Dr. N #200
St. Petersburg, FL 33702
USA

In your letter, please describe in as much detail as possible the ways in which you believe that the Privacy Policy has not been complied with. We will investigate your complaint promptly.

Please note that WisePay is not responsible for the content or privacy practices of non-WisePay websites to which this Site or any other WisePay website may link. Also, WisePay is not responsible for the privacy practices of its customers or users of its customer websites. You should review the additional privacy policy of the customer site before using the site.