

PRIVACY POLICY — YOUR PRIVACY RIGHTS

Cuentas, Inc.

Last updated July 9, 2019

This Privacy Policy applies to the sites and apps where it appears.

This Policy describes how we treat personal information we collect on the apps and/or websites where this policy appears. This includes our mobile websites and apps where this policy appears.

Certain of our platforms may also contain a privacy policy of a bank and/or processor servicing one or more of our products. To learn about the privacy practices of this bank or processor (which may differ from our privacy practices), please refer to the bank or processor's policy statement.

We collect information from and about you.

We collect contact information. For example, we might collect your name and street address. We might also collect your phone number, Social Security Number (SSN), Tax ID Number (TIN) or email.

We collect payment and billing information. For example, we collect your credit card number and zip code if you buy a gift card or other products or services. We might also collect your gift card or loyalty card number and pin number.

We collect information about your transactions. For example, we might collect the amount you have left on your stored value card, your spending and payment history, and dispute or claim requests. We also might collect your card's confirmation number and serial numbers including for card activation or redemption purposes.

We collect demographic information. For example, we may collect information like your gender and age.

We collect information you submit or post. If you post content, we will collect the information you provide to us. We also collect information when you contact us or if you apply for a job online. This might include your work history.

We collect other information. If you use our website, we may collect information about the browser you're using. We might look at what site you came from, or what site you visit when you leave us.

We collect information in different ways.

We collect information directly from you. For example, we may collect information if you contact us, register for an account, or make a purchase. We also collect information if you post a comment, apply for a job, or make a request.

We collect information from you passively. We use tracking tools like browser cookies and web beacons to collect information from you. We collect information about users over time when you use this website. We may have third-parties collect personal information this way. We also collect information from our mobile apps. Learn more about these tools and how you can control them through the CuentasApp.

We get information about you from third-parties. For example, our business partners and clients may give us information about you. Social media platforms may also give us information about you.

We combine information. For example, we may combine information that we have collected offline with information we collect online, or we may combine information we get from a third-party with information we already have.

We use your information as disclosed and described below.

We use information to respond to your requests or questions. For example, we might use your information to fulfill your order or complete your transaction.

We use information to improve our products and services. We might use your information to customize your experience with us. We may use your information to make our websites and products better.

We use information to look at site trends and customer interests. We may use your information to make our website and products better. We may combine information we get from you with information about you we get from third-parties.

We use information for security purposes. We may use information to protect our company, our customers, or our websites.

We use information for marketing purposes. For example, we might send you information about special promotions or offers. We might also tell you about new features or products. We might also use your information to serve you ads about products and offers. These might be our own offers or products, or third-party offers or products we think you might find interesting. To learn about your choices for these communications, read the choices section below.

We use information to send you communications. For example, we might send you emails about your account or purchase. We may contact you about your feedback and comments. We might also contact you about this policy or our website terms. We may also use push notifications on our mobile apps.

We use information as otherwise permitted by law.

We may share information with third-parties, subject to applicable law.

We will share information within the Sutton Bank and Interactive Communications International family of companies.

We will share information with third-parties who perform services on our behalf. For example, we share information with vendors who help us manage our online account registration process or who fulfill your purchases. Some vendors may be located outside of the United States. We also share information with third-parties that assist us in marketing our products or services.

We will share information with our business partners and clients. For example, we will share information with a third-party if we operate their gift card program. These third-parties may send you information about events and products by mail or email.

We may share information if we think we have to in order to comply with the law or to protect ourselves. For example, we will share information to respond to a court order or subpoena. We may also share it if a government agency or investigatory body requests. Or, we might also share information when we are investigating potential fraud. We will also include your information in a winner's list if you are the winner of a sweepstakes or promotion. This list may be shared publicly.

We may share information with any successor to all or part of our business. For example, if part of our business was sold we may give our customer list as part of that transaction.

We may share information for other reasons we may describe to you.

You have certain choices about how we use your information. You can opt out of sharing information with affiliates or non-affiliates by sending a written notice to us at

Cuentas, Inc.
Attn: Legal Department
P.O. Box 11501.
Miami, FL 33101

You can opt out of receiving our marketing emails. To stop receiving our promotional emails, follow the instructions in any promotional message you get from us. Even if you opt out of getting marketing messages, we will still be sure to send you transactional messages. For example, we may still contact you about your orders.

You can control certain cookies and tracking tools. To learn how to manage how we – and our vendors – use cookies and other tracking tools and to read our Do Not Track policy, please visit the CuentasApp.

You can control tools on your mobile devices. For example, you can turn off the GPS locator or push notifications on your phone.

You have other controls you can exercise. You can choose whether or not to share personal information. If you choose not to share, some parts of our sites and some services may be more difficult or impossible to use.

Your California Privacy Rights

If you reside in California, you have the right to ask us one time each year if we have shared personal information with third-parties for their direct marketing purposes. To make a request, please write to us at the address listed below. Indicate in your letter that you are a California resident making a "Shine the Light" inquiry.

Cuentas, Inc.
Attn: Legal Department
P.O. Box 11501
Miami, FL 33101

These sites and apps are not intended for children.

Our sites and apps are meant for adults. We do not knowingly collect personally identifiable information from children under 13 without permission from a parent or guardian. If you are a parent or legal guardian and think your child under 13 has given us information, please email us at privacy@cuentas.com Please mark your inquiries "COPPA Information Request."

Parents, you can also learn more about how to protect children's privacy online at the Federal Trade Commission's consumer website.

We use standard security measures.

The Internet is not 100% secure. We cannot promise that your use of our sites will be completely safe. We encourage you to use caution when using the Internet. This includes not sharing your passwords.

We keep personal information as long as it is necessary or relevant for our business. We also keep information as otherwise required by law.

We store information both in and outside of the United States.

If you live outside of the United States, you understand and agree that we may transfer your information to the United States. This site is subject to U.S. laws, which may not afford the same level of protection of those in your country.

We may link to third-party sites or services we do not control.

If you click on one of those links, you will be taken to websites or apps we do not control. This policy does not apply to the privacy practices of those websites or apps. Read the privacy policy of other websites and services carefully. We are not responsible for these third-party sites or services.

Feel free to contact us if you have more questions.

If you have any questions about this Policy or other privacy concerns, please email us at privacy@cuentas.com. You can also write to us or call us at:

Cuentas, Inc.
Attn: Legal Department
P.O. Box 11501
Miami, FL 33101

What we will do if there is an update to this policy.

From time to time we may change our privacy practices. We will notify you of any material changes to this policy as required by law. We will also post an updated copy on our website. Please check our site periodically for updates.

© 2019 Cuentas. All rights reserved.