

GreenBox POS Privacy Policy.

Introduction

This Privacy Policy ("Policy") explains how GreenBox POS and its mobile applications (collectively referred to as "the 'Applications,'" "we," "us," or "our") collects, stores, uses, and shares personal data when you visit our website or use our services.

Purpose of This Privacy Policy

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data.

This privacy policy supplements other notices and privacy policies and is not intended to override them.

Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

The Data We Collect About You

Personal data, or personal information, means any information about an individual from which that person can be identified directly or indirectly. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you, which we have grouped together as follows:

- **Identity Data** includes 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, photograph, phone number, or other similar identifiers.
- **Contact Data** includes name, billing or mailing address, email address and telephone numbers.
- **Financial Data** includes payment information such as credit card details and bank account numbers.

- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access this website.
- **Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our website, products, and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from our third parties and us and your communication preferences.

If You Fail to Provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

How is Your Personal Data Collected?

We use different methods to collect personal information from and about you including through:

- **Direct interactions:** You may give us your name, billing address, shipping address, payment information, including credit card numbers, email addresses, and phone numbers.
- **Automated technologies or interactions.** As you interact with our website, we will automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs, and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.
- **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.

How We Use Your Personal Data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data, although we will get your consent before sending third-party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for Which We Will Use Your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

Purpose/Activity	Type of Data	Lawful Basis for Processing
To register you as a new customer	a) Identity b) Contact c) Financial	Performance of a contract with you
To provide our services including: a) Manage payments, fees, and charges b) Customer support	a) Identity b) Contact c) Financial d) Transaction e) Marketing and Communications	a) Performance of a contract with you b) Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: a) Notifying you about changes to our terms or privacy policy b) Asking you to leave a review or take a survey	a) Identity b) Contact c) Profile d) Marketing and Communications	a) Performance of a contract with you b) Necessary to comply with a legal obligation c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)

<p>To allow you to complete a survey</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications 	<ul style="list-style-type: none"> a) Performance of a contract with you b) Necessary for our legitimate interests (to study how customers use our products/services, to develop them and grow our business)
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical 	<ul style="list-style-type: none"> a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise) b) Necessary to comply with a legal obligation
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Profile d) Usage e) Marketing and Communications f) Technical 	<p>Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)</p>
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<ul style="list-style-type: none"> a) Technical b) Usage 	<p>Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</p>
<p>To make suggestions and recommendations to you about goods or services that may be of interest to you</p>	<ul style="list-style-type: none"> a) Identity b) Contact c) Technical d) Usage e) Profile f) Marketing and Communications 	<p>Necessary for our legitimate interests (to develop our products/services and grow our business)</p>

Promotional Offers From Us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased products from us and you have not opted out of receiving that marketing.

Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any third party for marketing purposes.

Opting Out

You can ask us or third parties to stop sending you marketing messages at any time.

Where you opt-out of receiving these marketing messages, this will not apply to personal data provided to us as a result of a product purchase, warranty registration, other transactions.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information, please see our [Cookie Policy](#).

Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Disclosures of Your Personal Data

We may share your personal data across our services and with third parties to help us provide services, protect our customers from risk and fraud, market our products, and comply with legal obligations. We may share personal data with:

- 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 to support regulatory and legal requirements.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

International Transfers

Whenever we transfer your personal data out of the European Economic Area (“EEA”), we ensure a similar degree of protection is afforded to it by using standard contractual clauses approved by the European Commission, which give personal data the same protection it has in Europe.

Data Security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know.

They will only process your personal data on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

Data Retention

We will only retain your personal data for as long as reasonably necessary to fulfill the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Your Legal Rights

As the subject of the personal data, you have rights related to the personal data that we hold about you. At any time, you have the right to:

Access	Provide the personal data you have about me.
Rectify	Correct the personal data you have about me.
Delete	Delete the personal data you have about me.
Object	Object how my personal data is used.
Restrict Processing	Request that we restrict the processing of your personal data.
Portability	Transfer of your personal data to you or to a third party.

If you wish to exercise any of the rights set out above, please contact us at support@greenboxpos.com.

Your California Privacy Rights.

If you are a California resident, please visit our [Privacy Policy for California Residents](#) for additional information about our processing of personal information and your California privacy rights.

No Fee Usually Required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive.

What We May Need From You

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Changes to Our Privacy Policy

We keep our privacy policy under regular review. 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 Details

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 the Privacy Policy, please do not hesitate to contact us at:

- **Phone:** 619-930-5500
- **Website:** <http://www.greenboxpos.com/>
- **Email:** support@greenboxpos.com
- **Postal Address:** 3131 Camino Del Rio North, Suite 1400, San Diego, CA 92108

You have the right to make a complaint at any time to the US Federal Trade Commission ("FTC"), the US supervisory authority for data protection issues (<https://www.ftc.gov>). We would, however, appreciate the chance to deal with your concerns before you approach the FTC so please contact us in the first instance.

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