Visa Checkout privacy policy

UPDATED: May 23, 2018

Your privacy is important to Visa. Our privacy policy tells you how Visa Checkout collects, protects, uses and shares your personal information when you use our service. Here are some important highlights. You can also review our <u>full privacy</u> policy below or download the PDF.

Privacy policy highlights

Information we collect

We may collect:

- Your full name, contact information, payment card numbers and card transaction information when you use Visa Checkout,
- Information about your browser and device when you use Visa Checkout,
- Information from other sources, such as the issuer of the payment cards you use with Visa Checkout and merchants you use Visa Checkout with, and
- Other information to enable new services and promotions, when you give your consent.

Main ways we use and share information

These are the main ways we use your information:

- To provide, operate and improve Visa Checkout,
- To fight fraud and money laundering, improve security and comply with international sanctions requirements, including screening users against relevant sanctions lists,
- · To send you administrative emails about your Visa Checkout account, and
- For promotional purposes (in some countries/territories), when you give your consent.

These are the main ways we share your information:

 With merchants and other services that support consumer use of Visa Checkout, to complete the actions you initiate using Visa Checkout (payment card numbers are included in the information we may share),

- With the issuer of your cards and other participants in your cards' payment network(s), to authenticate and process your transactions using Visa Checkout,
- With the issuer of your cards, to operate other services related to Visa Checkout,
- With our service providers, who help operate Visa Checkout and are required to protect your personal information,
- With Visa affiliates, to help operate Visa Checkout and for development of Visa's products and services, and
- With law enforcement and public authorities as required by applicable laws and regulations.

Except as described here and in our <u>full privacy policy</u>, we will not give or sell your personal information to any unaffiliated third party without your consent.

If you are a resident of Brazil, the European Economic Area, France, Germany, Italy, Russia, or the United Kingdom, please see the <u>additional country/territory-specific privacy notices</u>.

Your key choices

You have choices about your personal information:

- You can edit, change or update your information by logging in to Visa Checkout.
- You can close your Visa Checkout account by following the instructions in the Visa Checkout Customer Support section.
- You may have other choices, such as choosing to receive promotional emails, as described in the full privacy policy below.
- You can send us any questions about privacy using the <u>contact</u> information provided below.

Full privacy policy

The terms "Visa", "us", "we" or similar pronoun in the Privacy Policy refers to Visa U.S.A. Inc. Please read below to learn how we collect, protect, use and share your data.

If you are a resident of Brazil, the European Economic Area, France, Germany, Italy, Russia or the United Kingdom, please see the <u>additional country/territory-specific privacy notices</u>.

If you sign up for additional Visa Checkout services or for services operated by your <u>issuer</u> or another third party that may be accessible through Visa Checkout,

there may be additional or different privacy policies (such as your <u>issuer's</u> privacy policy) which describe any additional or different data practices that apply to those services. Also, other Visa products and websites have their own separate privacy policies. This privacy policy only applies to Visa Checkout.

Information we collect

"Personal Information" (sometimes called "personal data") is information which can be used to identify you as an individual or (in some jurisdictions) which relates to an identifiable individual, as provided by applicable law. We may collect Personal Information any time you use any service or functionality of Visa Checkout, including websites for Visa Checkout or the Visa Checkout Email Subscription described in the Terms of Service. The Personal Information we collect may include (1) information that you provide to us as part of using Visa Checkout, (2) information about your browser or device, (3) information provided by other sources, including your issuer, merchants, digital wallets, or our service providers, and (4) when you give your consent, other information to enable new services and promotions. The collection of all of the Personal Information described herein is necessary for your use of Visa Checkout services.

Information you provide to us as part of using Visa Checkout may include:

- Your full name.
- Contact information (email address, telephone number, billing address and shipping address).
- Payment card information (payment account number, expiration date and security code such as CVV2).
- Information about your intention to complete a transaction with Visa Checkout (date/time, merchant and purchase price).

When you use Visa Checkout or visit websites for Visa Checkout or the Visa Checkout Email Subscription, we may collect information about your browser and/or device (including information obtained through the use of <u>cookies and similar tracking technologies</u>) such as:

- How you use the Visa Checkout services and website—for example, what
 pages you visit, how frequently you use Visa Checkout, how many and what
 types of cards you have enrolled in Visa Checkout, and the types and
 frequency of Visa Checkout online purchases you begin or complete.
- IP address and information about the devices you use to access Visa Checkout, including device identifiers and accessing of the same account across different devices.

Visa Checkout may get information about you from other sources. For example:

- In some cases, Visa Checkout may integrate with other services or functionalities offered by your <u>issuer</u>, such as an alerts service. If you choose to use such a service, we and your <u>issuer</u> may collect and share information (such as your mobile phone number for an alerts service) needed to make the service accessible through your Visa Checkout account.
- We may get information from third parties who are authorized to give us information about you. For example, Visa may partner with social media or other partner websites who are authorized to share data about you under the terms and privacy policies of their respective services.
- Visa may also monitor social media channels to learn about experiences that Visa Checkout users choose to share, and we may respond to users through social media channels.
- We may get information from other Visa services if we are authorized to do so in accordance with their privacy policies or applicable agreements. These services include ones that will, for your convenience, automatically update your payment account numbers, any tokens, and expiration dates and delete invalidated cards, if your <u>issuer</u> participates in such a service.

If we need to collect Personal Information in addition to what is outlined above, we will first notify you before doing so.

We may collect or compile <u>aggregated</u> and <u>de-identified</u> information about Visa Checkout users such as enrollment numbers and demographic group information. To the extent that such information is not Personal Information under applicable law, we may, for lawful purposes, use this or any other non-Personal Information or share it with third parties. By accepting this privacy policy, you agree that Visa may aggregate or de-identify your Personal Information for these purposes.

Cookies, tracking, authentication and targeted advertising

When you use Visa Checkout, other parties providing services to us may set and access cookies and similar tracking technologies on your computer or device in order to collect information about your online web-browsing activities over time and across different websites and services (including online or cloud computing services and online applications) or mobile applications as described in this Privacy Policy. Visa may engage third parties to serve advertisements that may be of interest to you, based on information that such parties have collected about your visit to the Visa Checkout website and third party websites and applications. For example, we may use third party advertising networks to serve advertisements to you related to Visa Checkout because you previously visited a

Visa Checkout website (a behavioral advertising practice sometimes called "retargeting").

To protect your account from fraud, we or our <u>service providers</u> may use device-related techniques (sometimes called "device fingerprinting") to authenticate that a user attempting to use a Visa Checkout account is actually the holder of the account. When you use device related authentication techniques, such as fingerprint authentication through your device, Visa Checkout does not receive biometric data about you.

In addition to using cookies, these techniques may collect information such as IP address, browser information, or other identifying details provided by your browser or device to identify the device being used to access the Visa Checkout service. We use any Personal Information collected through these device-related techniques strictly for fraud-protection purposes.

Many internet browsers allow users to send a "Do Not Track" signal to websites they visit. Visa Checkout has no mechanism to respond to such a signal.

For Australia, Canada and the United States: We have adopted the use of the AdChoices icon, which may appear on the footer of the Visa Checkout login page and on certain targeted ads that you may see. You may click on this AdChoices icon to learn more information about the collection and use of your information or to opt out of such collection in the future. Please keep in mind that: (i) you will need to opt-out on each browser on each of the computers or devices that you wish to exclude; and (ii) even if you opt out, you may still receive ads that are not customized for you.

In addition, you may be able to take advantage of the <u>tool to opt out of interest-based advertising</u> developed by the Network Advertising Initiative and the Digital Advertising Alliance. Where available, this tool provides a list of parties that may target advertisements based on your online web-browsing activities and the ability to opt out of their use of your information for that purpose.

For **European Economic Area users**: Please refer to our **Cookie Policy**.

How we use the information we collect

We primarily use the information we collect to provide Visa Checkout services to you. We may use your Personal Information to:

- Fulfill your requests and share your Personal Information with others to complete your transaction, enhance your transaction experience, personalize your experience, or when you ask us to.
- Analyze usage and generally improve Visa Checkout services.

- Safeguard security, prevent fraud, enforce our policies and comply with applicable international sanctions requirements (including screening users against relevant sanctions lists), in connection with Visa Checkout services and promotions.
- Contact you about Visa Checkout, including new features and services, where lawful. For example, we will email you administrative information, which may include information about changes to the <u>Terms of Service</u> and this privacy policy, password reset information when needed, or information about new aspects of Visa Checkout, for example.
- Send you <u>promotional emails</u> if you sign up for the Email Subscription described in the Terms of Service.
- Send text (SMS) messages, as permitted by applicable law, to provide administrative information such as a one-time password you request, or for promotional purposes when you give your consent.
- Contact you about other Visa services, if you have given your consent or as otherwise permitted by applicable law.
- Administer promotions related to Visa, if you have given your consent or as otherwise permitted by applicable law.
- Help personalize your Visa Checkout experience, other Visa services you
 use, and any promotions we deliver to you, if you have given your consent or
 as otherwise permitted by applicable law.
- Conduct data analysis and audits, develop new products, identify usage trends, determine the effectiveness of our promotional campaigns and operate and expand our business activities.
- As we reasonably believe necessary or appropriate: (a) under applicable law, including laws outside your country/territory of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country/territory of residence; (d) to enforce our Terms of Service; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or those of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- or other purposes, provided that we first notify you in order to obtain your consent.

To the extent that any information (including <u>aggregated</u> and <u>de-identified</u> information about Visa Checkout users) is not Personal Information under applicable law, we may use it for lawful purposes.

How we share information

We will use the information we collect only as described in this policy and any supplemental privacy policies for future Visa Checkout services we may offer and you may choose to use. We may share your Personal Information:

- With merchants and other services that support consumer use of Visa
 Checkout to complete the actions you initiate using Visa Checkout, which
 may include, for example, completing a transaction, facilitate shipping,
 resolving a dispute, signing up for a promotion, helping prevent fraud,
 providing customer service, and <u>card-on-file</u> storage storage. Merchants may
 use your Personal Information in accordance with their own terms, privacy
 policies, and any other permissions you give them. We recommend that you
 review each merchant's privacy policies to understand its handling of
 Personal Information.
- With your <u>issuer</u> to authenticate and process your transactions, to operate any <u>issuer</u> services accessible through Visa Checkout, to report how you use your payment card in Visa Checkout (including whether it is selected as your preferred card), and to enable your <u>issuer</u> to provide customer service, usage analysis, fraud prevention, and Visa related promotions (based on your preferences with your <u>issuer</u>). This may include information about whether you have loaded or removed a card from Visa Checkout and if you have chosen to close your Visa Checkout account. It does not include information about how you use your payment cards in Visa Checkout which are issued by a different <u>issuer</u>. Please note that your <u>issuer</u> may have its own terms and privacy policies governing how it will use and disclose Personal Information. We recommend that you review your <u>issuer's</u> terms and privacy policies to learn about its practices.
- In some countries/territories, with certain third-party digital wallets when we
 offer you the option to link to such digital wallets and you choose to do so. If
 this option is offered, you will have a choice whether to share Personal
 Information, including payment card information, between Visa Checkout and
 a given third-party digital wallet. (Note that purchases made online using
 Visa Checkout with third-party digital wallets may not be "tokenized." This
 means these transactions, like other Visa Checkout transactions, may result
 in the sharing of payment card information with merchants.)
- Among Visa <u>affiliates</u> to develop, operate and improve products and services, to facilitate customer service, to comply with legal obligations, and for other uses described in this privacy policy.
- With <u>service providers</u> that help us to operate our business. We require that they protect your Personal Information and only use it for specified purposes.
- To provide address auto-fill functionality, where available. If you enter your mailing address, your IP address and the string of characters you enter may be provided to and stored by Google Inc. Please note that Google may

process this information for its own purposes in accordance with <u>Google's</u> <u>privacy policy</u> and users are subject to <u>Google Maps/Google Earth additional</u> terms of service.

- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, services, division, assets or stock (including in connection with any bankruptcy or similar proceedings).
- As we reasonably believe necessary or appropriate: (a) under applicable law, including laws outside your country/territory of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including public and government authorities outside your country/territory of residence; (d) to enforce our Terms of Service; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or those of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- In ways other than those outlined above, provided that we first notify you in order to obtain your consent.

To the extent that any information (including <u>aggregated</u> and <u>de-identified</u> information about Visa Checkout users) is not Personal Information under applicable law, we may share it with third parties for lawful purposes.

How we protect your personal information

Visa maintains physical, technical, organizational and administrative safeguards to protect Personal Information, including firewalls and encryption to help protect the Personal Information we collect.

Cross-border transfer of your personal information

Visa is a global payment network with <u>affiliates</u> and <u>service providers</u> located outside of your country/territory of residence. As a result, Visa may instruct <u>affiliates</u> and/or <u>service providers</u> located in the United States, Singapore, the United Kingdom or Ireland to process any Personal Information collected by Visa Checkout at any time after it is collected. Such cross-border transfer is necessary for the provision of Visa Checkout services. Please note that these countries may have different laws and requirements about privacy and data use than where you live and may not ensure an equivalent level of protection. In certain circumstances, courts, law enforcement agencies, regulatory agencies, or security authorities in these countries may be entitled to access your Personal Information. By submitting your Personal Information, you agree to this cross-border transfer, storage and processing.

Any Personal Information that is transferred outside of your country/territory of residence by Visa or its <u>affiliates</u> or <u>service providers</u> will be stored, used, shared and retained by the recipient in accordance with this privacy policy. In particular, each <u>affiliate</u> or <u>service provider</u>responsible for processing Personal Information must keep the Personal Information confidential, ensure its security in the course of its processing and follow applicable legal requirements for the protection of the Personal Information.

How long we retain your personal information

We will retain your Personal Information for the period necessary to fulfill the purposes outlined in this privacy policy unless a longer retention period is required or permitted by law.

How you can access and edit your personal information

You can review and edit your Personal Information at any time by logging in to your account. You have the right to request access or make corrections to any of your Personal Information not available through an account. To do so, please <u>contact us</u> using our contact details provided <u>below</u>. Where permitted by law, we may charge you a reasonable fee for access. If Personal Information we hold about you is not accurate, complete and up to date, we will take reasonable steps to ensure that it is accurate, complete and up to date, or to delete it. You may exercise any legal rights to access, rectify, cancel or oppose to the processing of your data by contacting us using our contact details below.

Your choices

You can close your Visa Checkout account by following the instructions in the <u>Customer Support</u> section of the Visa Checkout website. Once your account is closed, you will no longer be able to access your account online. Even though your account is closed, we still may retain and use your Personal Information to comply with law, prevent fraud, resolve disputes and take other actions as permitted by law. We will cease to retain Personal Information, or <u>de-identify</u> it, as required by applicable law.

If you sign up for the Visa Checkout Email Subscription described in the <u>Terms of Service</u>, each <u>promotional emails</u> will include a link allowing you to unsubscribe from the Email Subscription and may include a link to adjust your <u>promotional email</u> preferences, including an option to tell us more about yourself and your interests. (We may use any preference information you provide to help us tailor the <u>promotional emails</u> you receive. We will not share information about your interactions with Visa Checkout or preference information with anyone except Visa <u>affiliates</u> and <u>service providers</u>.)

If you subscribe to or access other services through Visa Checkout that are operated by your issuer or another third party, those services may offer different ways of making choices. For instructions on how to make choices about those services, please consult the applicable terms and privacy policy.

Use by minors

Visa Checkout services are not directed to individuals under the legal age of majority in their respective countries/territories and we request that these individuals not provide Personal Information to Visa Checkout.

Changes to this privacy policy

We may change this privacy policy from time to time by posting an updated privacy policy to the Visa Checkout website. Where changes are made, we will notify you when you next log in to Visa Checkout. Changes to this privacy policy will be made in accordance with the Terms of Service.

Disputes

If you have a complaint about our treatment of your Personal Information, please contact our Chief Privacy Officer using the contact details provided below. Our Chief Privacy Officer will investigate your complaint and try to resolve any issue to your satisfaction.

How to contact Visa about your privacy concerns and questions

If you have questions or comments about our privacy practices, or would like to exercise your rights in accordance with this Privacy Policy, please

- Email us
- Call us:
 - From the United States or Canada: 855.847.2032 (toll-free number)
 - o From Brazil:
 - 0800-047-4060 (international toll-free number)
 - 844-565-1162 (toll-free number (EUA))
 - 0800-892-0581 (international toll-free number—hearing impaired)
 - 855-477-1002 (toll-free number (EUA)—hearing impaired)
 - From anywhere: +1 303.967.1041 (worldwide international direct dial; international calling rates apply),

 Write to us by sending a letter via mail to: Visa Chief Privacy Officer, 900 Metro Center Blvd., Foster City, CA, USA 94404

Definitions

Affiliate

A subsidiary or other company directly or indirectly controlled by Visa U.S.A. Inc. or its parent company Visa Inc. through ownership—for example, Visa International Service Association, Visa Worldwide Pte. Limited, Visa Canada Corporation, Visa International Servicios de Pago España, S.R.L., Visa Europe Services Inc., Visa do Brasil Empreendimentos Ltda., Inovant LLC, CyberSource Corporation, and TrialPay, Inc.

Aggregated information

Abstracted information about totals for a group of people, where no Personal Information about any individual within the group is revealed.

Card-on-file storage

When a merchant stores your payment card information with your consent. For example, you may choose this to make future transactions easier to complete.

De-identified information

Information that has been altered so that no Personal Information can be associated with an individual—for example, by masking removing personally identifiable details from a record.

Issuer

A bank or other institution authorized to issue a given payment (credit, debit or prepaid) card.

Promotional emails

Emails from Visa that advertise offers and promotions sponsored by Visa, merchants that accept Visa Checkout, and/or other partners.

Service provider

A third-party vendor providing services to a business. Service providers are "data processors" for purposes of law in the European Economic Area. The names and

addresses of current service providers to Visa Checkout that may receive Personal Information are listed at the <u>Visa Checkout Service Providers</u> page and may be updated from time to time.