

# Customer Loyalty Accelerator Privacy Policy

Better ATM Services, Inc. (Better ATM Services) is incorporated in the state of Delaware (DE).

## Effective Date

This privacy policy is effective as of November 15, 2018.

## Introduction

Encore Incentives is a DBA (Doing Business As) of Better ATM Services and a certified loyalty program agency retained by your retailer to help enhance your customer experience; personalize incentives, offers and services to your preferences; and provide limited data collection only as needed to assist your retailer in providing these benefits and services to you. We respect and protect your information (see privacy policy information below) and welcome your feedback at [privacy@encoreincentives.com](mailto:privacy@encoreincentives.com).

Participating retailers, that install or use Customer Loyalty Accelerator ("the App"), accomplish this objective by compensating you with an immediate cash reward in exchange for your contact information and the ability to collect certain information that allows them to personalize your shopping experience ("the Service"). We collect information including but not necessarily limited to your name, address, phone number, email address, and purchasing activity. Your retailer will use this data to provide you with a more personalized and satisfying shopping experience each time you visit.

Your trust is very important to both your retailer and to Encore Incentives. That's why we are committed to helping you clearly understand why and how we collect, use and store your information. By enrolling in a loyalty program managed by Encore Incentives or by visiting Encore Incentives' website, you are agreeing to the terms of this Privacy Policy.

Encore Incentives may update this Privacy Policy from time to time in order to reflect, for example, changes to our privacy practices or for other operational, legal, or regulatory reasons. If we make material changes to this Privacy Policy, we will give you notice of such changes by posting the revised policy on

this website, and where appropriate, by other means. By continuing to use this website or a loyalty program managed by Encore Incentives, you agree to the revised policy.

## Information from merchants

### What information do we collect from participating retailers and why?

In exchange for your retailer compensating you in cash, we collect your name, zip code, email address, phone number, and information pertaining to your purchases.

- We need this information to supply your favorite retailer with the means to provide you with exceptional shopping experiences that are personalized for you based upon this information, including ensuring that you receive offers in which you are highly likely to have an interest.

We also collect data about how and when you visit our website and access your account, including but not necessarily limited to information about the device and browser you use, your network connection, your IP address, and the pages you visit on our website and the time you spend on each of those pages.

- We need this information to give you access to, and improve, our Service.

### When do we collect this information?

We collect personal information when you enroll in your participating retailer's loyalty program and each time you visit the retailer and interact with its loyalty program. We also collect personal information when you access our Service by visiting our website or otherwise provide us with the information.

## Information from cookies and similar tracking technology

A cookie is a small amount of data, which may include a unique identifier. Cookies are sent to your browser from a website and

# Customer Loyalty Accelerator Privacy Policy

stored on your device. We assign a different cookie to each device that accesses our website.

## Why do we use cookies and similar technology?

We use cookies to recognize your device and provide you with a more personalized experience.

We may also use cookies to serve personalized offers from Google, Facebook, Bing, and other third-party vendors.

**Opting out:** You can opt out of personalized offers served via specific third-party vendors by visiting the Digital Advertising Alliance's [Opt-Out page](#).

We may also use web beacons, tracking technology and other automated tracking methods on our website, in communications with you, and in our products and services, to measure performance and engagement.

Please note that because there is no consistent industry understanding of how to respond to "Do Not Track" signals, we may not alter our data collection and usage practices when we detect such a signal from your browser.

## Information we DO NOT collect

- Credit card information
- Geo tracking information
- Social Security numbers
- Banking information

## When and why do we share personal information with third parties?

Encore Incentives works with third parties to help provide you with our Service and we may share certain necessary personal information with them to support these efforts. In certain limited circumstances, we may also be required to share information with third parties to conform to legal requirements or to respond to lawful requests by public authorities, including to meet national security or law

enforcement requirements. We may also receive personal information from our partners and third parties.

- Personal information may be shared with third parties to prevent, investigate, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of our Terms of Service or any other agreement related to the Service, or as otherwise required by law.
- Personal information may be shared with third-party vendors to help us conduct marketing and/or advertising campaigns.
- Personal information may not be collected by third-parties about a user's online activities, over time and across different sites, services and applications, when that user uses our site, service or application.
- Personal information may also be shared with a company that acquires our business, whether through merger, acquisition, bankruptcy, dissolution, reorganization, or other similar transaction or proceeding. If this happens, we will post a notice on our website.

Encore Incentives is responsible for all onward transfers of personal information to third parties in accordance with the EU-U.S. Privacy Shield Framework, the Swiss-U.S. Privacy Shield Framework, and Canada's Personal Information Protection and Electronic Documents Act (PIPEDA).

Encore Incentives will always ask for your consent before sharing your personal information with third parties for purposes other than those described in this Section.

## What do we do with your personal information when you terminate your relationship with a participating vendor?

- We will continue to store archived copies of your personal information for legitimate business purposes and to comply with the law.
- We will continue to store anonymous or anonymized information, such as website visits, without identifiers, in order to improve our Service.

# Customer Loyalty Accelerator Privacy Policy

## What we don't do with your personal information

- We do not and will never share, disclose, sell, rent, or otherwise provide personal information to other companies for the marketing to you of their own products or services.
- We don't share one merchant's customer info with another merchant.
- We don't collect information from any individual under the minimum age of 16. Some retailers may have internal policies with higher minimum ages.

## How do we keep your personal information secure?

We follow industry standards on information security management to safeguard the personal information you've entrusted to us. Our information security systems apply to people, processes and information technology systems on a risk management basis.

We perform annual audits to ensure our handling of your credit card information aligns with industry guidelines. We are certified as a PCI DSS Level 1 compliant service provider, which is the highest level of compliance available, and our platform is audited annually by a third-party qualified security assessor.

No method of transmission over the Internet, or method of electronic storage, is 100% secure. Therefore, we cannot guarantee the absolute security of your Personal information.

## Control and access to your personal information

You retain all rights to your personal information and can access it anytime. In addition, Encore Incentives takes reasonable steps to allow you to correct, amend, delete, or limit the use of your personal information. You can update many types of personal information, such as payment or contact information, directly within your account settings. If you are unable to change your personal information within your account settings, please contact us to make the required

changes. It's important to remember that if you delete or limit the use of your personal information, the Service may not function properly.

If you have any questions about your personal information or this policy, or if you would like to make a complaint about how Encore Incentives processes your personal data, please contact Encore Incentives by email at [privacy@encoreincentives.com](mailto:privacy@encoreincentives.com).

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