



PaySchools Privacy Policy

Effective Date: February 1, 2017

Our Commitment to Privacy

CP-DBS, LLC d/b/a PaySchools (dba PaySchools) (“PaySchools”, “we”, “us”, “our”) is the owner and operator of this website. Your privacy is important to us. Our services provide schools and school districts with K-12 payment solutions for food service, fees, activities, transportation, before-and-after-school programs, and many others. Our family of companies and the products and services we offer represent total solutions: online payment, point-of-sale, online free-reduced lunch applications, and powerful reporting for the needs of today’s (and tomorrow’s) schools and school districts. We are committed to protecting personally identifiable information that you or the parents of children in your district schools may provide us through our website. We have adopted this Privacy Policy to explain what information may be collected on our website, how we use this information, and under what circumstances we may disclose the information to third parties. This Privacy Policy applies to all visitors to our website, our customers who create an account, and anyone else who accesses or uses our products and services. **WHEN YOU ACCESS OUR WEBSITE, YOU AGREE TO THIS PRIVACY POLICY. IF YOU DO NOT AGREE TO THIS PRIVACY POLICY, OR TO ANY CHANGES WE MAY SUBSEQUENTLY MAKE, IMMEDIATELY STOP ACCESSING OUR WEBSITE.**

The Information We Collect

Personally Identifiable Information. When you register on the website for one of our family of products, you must set up an account with us. We collect and store personally identifiable information about you – such as your name, address, e-mail address, phone number, and data associated with your payment method (credit card or bank account information) – as part of the account set-up process. We also collect personal financial information where required as part of our services. We collect transaction and experience information, such as information necessary to any transactions with us, webinars or tutorials viewed, or documentation about our products and services you have downloaded, as well as information about our communications with you. We need this information to provide the products and services that you request from our website and to let you know of additional products and services about which you might be interested.

Non-personally Identifiable Information. We automatically collect certain non-personally identifiable information when you visit our website, such as the following:

- Log data: Our servers automatically record information when you use our website, such as your IP address, the type of browser you are using and its settings, the third party website you visited immediately prior to accessing our website, the operating system you are using, the domain name of your Internet service provider, the search terms you use on our website, the specific website pages you visit, and the duration of your visits.

- Cookie data: Like many websites, we use “cookies” to obtain certain types of information when your web browser accesses our website. “Cookies” are small text files that we transfer to your computer's hard drive or your Web browser memory to enable our systems to recognize your browser and to provide convenience and other features to you, such as recognizing you as a frequent user of our website. Some of the cookies we use are associated with your account with us (including personal information about you), and other cookies are not.

We may use “session cookies” (cookies that last until you close your browser) or “persistent cookies” (cookies that last until you or your browser delete them). Examples of the information we collect and analyze from cookies include your activity on our website, including the URL you come from and go to next (whether this URL is on our site or not). Remember that the cookies that we use do not contain and are not tied to personally identifiable information.

If you are concerned about the storage and use of cookies, you may be able to direct your internet browser to notify you and seek approval whenever a cookie is being sent to your Web browser or hard drive. You may also delete a cookie manually from your hard drive through your internet browser or other programs. Please note, however, that some parts of our website will not function properly or be available to you if you refuse to accept a cookie or choose to disable the acceptance of cookies.

- Experience data: We may collect other information that is voluntarily provided by you from time to time if you respond to surveys, polls or questionnaires, and/or website registration forms. Such information may include personal preferences, opinions and experiences with our products and services, and may be provided anonymously.

Use of Information About You

We use personally identifiable information you provide solely to complete your payment transaction or application process, respond to your inquiries, to make further inquiry as to your interest in our products, and to provide our services to you. We will use your contact information to contact you regarding your interest in our products and services, and to provide administrative notices and communications relevant to your use of our website and our products and services.

We use non-personally identifiable information in a variety of ways, such as to analyze website traffic (such as aggregated information on the pages visited by our users), which allows us to improve the design and content of our website. We may use your non-personally identifiable information by itself or aggregate it with information we have obtained from others to analyze our products and services. We may also link your IP address to your personal information but only in the event that there are issues relating to the origin of a payment transaction.

We may respond to concerns and questions you have sent to our email address, and may send you promotions and news about the services you use or other products and services we think may be of interest to you. Aside from the foregoing, we will not contact you about any other matters, unless you specifically request it.

How and when we share information

With your consent. By using our services, you consent to our sharing your personally identifiable information with our service providers and affiliates as necessary to complete your payment transaction or for other services you have registered for.

With Schools and as directed by the Schools. We partner with schools and school districts (“Schools”) to deliver our services. We have entered into a separate agreement with your child’s School for this purpose. We will share your personally identifiable information with your child’s School in order to fulfill our legal and contractual obligations to your child’s School. In addition, we will share your personally identifiable information as directed by such Schools. In some cases, our services have the ability to work with non-PaySchools software that is used by your child’s School (“**Non-PaySchools Software**”). When Non-PaySchools Software is operated by a third party on a School’s behalf, we may disclose your personally identifiable information to that third-party software provider at your School’s request. For example, our services have been designed to work with several third party student data management systems. If your School requests, we will send and receive data (which may include your personally identifiable information) to the provider of that student data management system so that our Services and that system can operate together.

Under no circumstances will we sell or use personally identifiable information or student data for marketing or other commercial purposes.

Third Party Providers. We will share your personally identifiable information outside of our organization with third party providers in order to deliver our services, as follows:

- with our agents and contractors in order to achieve successful completion of your payment transaction;
- in the case of an application we are processing for you, with specially authorized persons within your school or school district; or
- to assist in providing support for our operations.

In addition, we may employ third parties to process personal information on our behalf for the installation of new software or for security testing of our systems based on our instructions and in compliance with this Privacy Policy. Under no circumstances will we share, rent or sell personally identifiable information for commercial purposes.

Email communications. If you send us an email with questions or comments, we may use your email address to respond to your questions or comments, and we may save your questions or comments for future reference. We may email you

- to process your payments and send you payment receipts
- if you request a particular service or sign up for a feature that involves email communications,
- information relating to our products and services that you use (e.g., product updates, customer support, etc.),
- information about our other products and services,
- updates to this Privacy Policy or our Terms of Use, or any additional terms that may govern your use of all of part of our Services, or
- where you have consented to being contacted by email for a particular purpose.

You may unsubscribe from receiving future commercial email communications from us by clicking the "unsubscribe" link included at the bottom of any marketing emails we send, or by emailing us as provided in the Contact Us section below. However, we reserve the right to send you transactional emails such as customer service communications in connection with the products you have purchased. For security reasons, we do not recommend that you send personal information, such as passwords, social security numbers, or bank account information, to us by email.

Transfer of Assets. As we continue to develop our business, we may sell or purchase assets. If another entity acquires us or all (or substantially all) of our assets, the personally identifiable information and non-personally identifiable information we have about you will be transferred to and used by this acquiring entity. Also, if any bankruptcy or reorganization proceeding is brought by or against us, all such information may be considered an asset of ours and as such may be sold or transferred to third parties.

Where required by law. We reserve the right to disclose any personally identifiable or non-personally identifiable information about you if we are required to do so by law, with respect to copyright and other intellectual property infringement claims, or if we believe that such action is necessary to: (a) fulfill a government request; (b) conform with the requirements of the law or legal process; (c) protect or defend our legal rights or property, our website, or other customers; or (d) in an emergency to protect the health and safety of our website's customers or the general public.

What Choices Do You Have About Your Account and Our Use of Your Information?

Our goal is to provide you with simple and meaningful choices about how your information is used. If you are a customer, you control your choices by your selections when you set up your account with us, for example to control the email you receive from us. Your account information will be retained in our database and maintained for future orders or transactions and as required under applicable law, rules, and/or regulations. It is your responsibility to ensure that the account information is accurate and you should update the information as necessary. We do retain information concerning transactions other than personally identifiable information. For example, we retain non-personally identifiable data concerning the number, frequency, size and purpose of transactions.

You have a right to inspect and review your account information, including your personally identifiable information. If you request it, we will provide you with a copy of your account information.

Closing your account

If at any time you choose to discontinue your use of the services we provide, you should notify us and we will inactivate your account. Any data concerning your past transactions or account activity will no longer be available and will be stored in a secure manner. We are legally required to maintain a backup copy of such transaction data for 13 months after the transaction was completed. Thereafter, the copies of data you have provided in connection with any transactions you complete through use of our products are removed from our website and securely destroyed. We do not control how our partners retain, store and destroy data that they have obtained access to from third parties such as your school district in connection with completing your transactions. You should check their websites for more information on their practices.

California Do Not Track Disclosures

Certain browsers may offer you the option of providing notice to websites that you do not wish for your online activities to be tracked for preference based advertising purposes (“DNT Notice”). Some browsers are, by default, set to provide a DNT Notice, whether or not that reflects your preference. Providing DNT Notice is often touted as a means to ensure that cookies, web beacons and similar technology are not used for preference based advertising purposes – that is, to restrict the collection of information your online activities for advertising purposes. Since we do not engage in targeted advertising, we do not track your online activity while on our website for those purposes.

Your California Privacy Rights

Residents of the State of California, under certain provisions of the California Civil Code, have the right to request from companies conducting business in California a list of all third parties to which the company has disclosed certain personally identifiable information, as defined under California law during the preceding year for third party direct marketing purposes. You are limited to one request per calendar year. In your request, please attest to the fact that you are a California resident and provide a current California address for our response. You may request the information in writing at: Data Business Systems, 17011 Lincoln Ave Parker, CO 80134.

Your New York Privacy Rights

Schools that use our services and that are subject to New York law must provide the parents of their students with a “Parent’s Bill of Rights”, and must cause their third party contractors to agree to honor the Parent’s Bill of Rights. Where requested by a school or school district that uses our services, PaySchools has signed such school or school district’s Parent’s Bill of Rights.

Our Commitment to Security

We have implemented industry standard administrative, technological and physical security measures we consider reasonable and appropriate to protect against the loss, misuse and alteration of the information under our control. In particular, our security measures are sufficient to permit schools and school districts to comply with the requirements of and meet any obligations they may have with respect to the federal student privacy law known as FERPA, as well as all applicable state data protection laws. We use Digicert, which specializes in providing Secure Sockets Layer (SSL) protocol, an industry standard for transmitting data securely over the Internet, to encrypt the information before it is transmitted to us by you. Once we receive the information, your data is protected through a combination of strictly enforced procedures and a secured computer network designed in accordance with best practice guidelines. Login and password protection, multiple firewalls, multiple layers of data encryption and an intrusion detection system are all used to protect your data. We cannot, however, guarantee or warrant the security of any information you disclose or transmit to us online and are not responsible for the theft, destruction, or inadvertent disclosure of your personally identifiable information. We recommend that you take steps to protect the privacy and security of your personal and payment information and your activity while using the internet, as well as your account access information.

Children Under 13

We have no way of distinguishing the age of individuals who access our website. The features, programs, promotions and other aspects of our website requiring the submission of personally identifiable information are not intended for children. We do not knowingly collect personally identifiable information from children under the age of 13. If you are a parent or guardian of a child under the age of 13 and believe he or she has disclosed personally identifiable information to us please contact us at info@payschools.com. A parent or guardian of a child under the age of 13 may review and request deletion of such child's personally identifiable information as well as prohibit the use thereof.

Changes to our Privacy Policy

This Privacy Policy is effective as of the date stated above. We reserve the right to revise this Policy or any part of it from time to time. We will post a new or revised Policy to our website, and we suggest you review our Privacy Policy periodically when accessing our website.

Contact Information

You may contact us at info@payschools.com if: (a) you have questions or comments about our Privacy Policy; (b) wish to view or make corrections to any personally identifiable information you have provided; (c) want to opt-out from receiving future commercial correspondence, including emails, from us or our affiliated companies; or (d) wish to close your account. We will respond to your request and, if applicable and appropriate, make the requested change in our active databases as soon as reasonably practicable. Keep in mind, however, that residual information may remain within our databases, access logs and other records for a limited time, as may be required by applicable laws and regulations, which may or may not contain your

personally identifiable information. Please also note that we may not be able to fulfill certain requests while allowing you access to certain benefits and features of our website. You may contact us as follows:

PaySchools
40 Burton Hills Blvd, Suite 415
Nashville, TN 37215
Attn: Counsel