



Privacy Policy

Effective Date: 3/1/2020

Welcome to KyckGlobal, Inc.!

This Policy applies to KyckGlobal and its affiliates (collectively "KyckGlobal", "we", "us", and "our.") We offer services that enable merchants to run businesses and to safely conduct online payments. Headquarters for KyckGlobal is located at 3575 Piedmont Rd Atlanta, GA 30305. This Privacy Policy describes our privacy practices concerning your use of our websites and our services.

Scope

For this Policy, we will be describing the types of Personal Data we collect through our online form and main website at www.kyckglobal.com. We will be describing how we use Personal Data, your rights and choices, and how you can contact us about our privacy practices. This policy does not apply to third-party websites, products, or services, even if they link to our services or sites, and you should consider the privacy practices of those third parties carefully.

Personal Data We Collect

Personal Data is any information that relates to an identified or identifiable individual. The personal Data that you provide directly to us through our Site and Online Form will be apparent from the context in which you provide the data.

- When you apply for a KyckGlobal account, we will collect your full name, email, phone number, business information, and financial information.
- When you register an employee or customer, we collect their full name and email.
- When an employee or customer complete their registration, we will collect personal information and financial information.

When KyckGlobal is contacted by email, we will collect the address and any other information you choose to include in the body of the email or response. If you contact us by phone, we will collect the phone number and may collect additional information in order to verify your identity.

If you are a Payer, you will provide your contact details, such as name, email, and telephone number. As part of the required due diligence request, you will provide us with financial and business information, such as government identifiers associated with you and your organization (such as your social security number, tax number, or Employer Identification Number).

If you are a Payee, you will provide contact details, such as name, email, postal address, and telephone number. In order to process payments, you will need to provide personal and financial information, such as social security or tax number.

When a payment is made, we will receive your transaction information. The information we collect will include payment method information, amount, date of transaction, and payment method (such as ACH, Cash, and PayPal). Different payment methods may require the collection of different categories of information. The Payer will determine the payment methods that it enables you to use, and the payment method information that we collect will depend upon the payment methods that are offered to the payee by the Payer. When a transaction is made, we may also use this information for authenticating based on transaction history.



When we conduct fraud monitoring, prevention, and detection activities, we may also receive Personal Data about you from our business partners, identity verification services, and publicly available sources as necessary to confirm your identity and prevent fraud. Our fraud monitoring, detection, and prevention services may use technology that helps us assess the risk associated with an attempted transaction that is enabled on the KyckGlobal website.

Our site uses cookies and other technologies to function effectively. These technologies record information about your use of the site, including:

- Browser and device data, such as IP address, device type, operating system and internet browser type, screen resolution, operating system name and version, device manufacturer and model, language, plug-ins, add-ons and language version of the Site.
- Usage data, such as time spent on the Site, pages visited, links clicked, language preference, and the pages that led or referred you to our Site.

To learn more about the cookies that may be served through our Site and how you can control our use of cookies, please see our [Cookie Policy](#).

How We Use Personal Data

We rely upon a number of legal grounds to ensure that our use of your Personal Data is compliant with applicable law. We use Personal Data to facilitate the business relationships we have with our Users, to comply with our financial regulatory and other legal obligations, and to pursue our legitimate business interests. We also use Personal Data to complete payments transactions and to provide payment-related services to our Users.

Contractual and pre-contractual business relationships. We use Personal Data for the purpose of entering into business relationships with prospective KyckGlobal Users, and to perform the contractual obligations under the contracts that we have with KyckGlobal Users. Activities that we conduct in the context include:

- Creation and management of KyckGlobal accounts, including the evaluation of applications to commence or expand the use of our Services;
- Accounting, auditing, and billing activities; and
- Processing of payments with KyckGlobal, communications regarding such payments, and related customer service.

Legal and regulatory compliance: We use Personal Data to verify the identity of our Users in order to comply with fraud monitoring, prevention and detection obligations, laws associated with the identification and reporting of illegal and illicit activity, such as AML and KYCK obligations, and financial reporting obligations. For example, we may be required to record and verify a User's identity for the purpose of compliance and legislation intended to prevent money laundering and financial crimes. These obligations are imposed on us by the operation of law, industry standards, and by our sponsor banks, and may require us to report our compliance to third party verification audits.

Legitimate business interests: We rely on our legitimate business interests to process Personal Data about you. The following list sets out the business purpose that we have identified as legitimate. In determining the content of this list, we balance our interests against the legitimate interests and rights of the individuals whose Personal Data we process.

- Monitor, prevent, and detect fraud and unauthorized payment transactions.
- Respond to inquiries and provide customer support.



- Promote, analyze, modify, and improve our products, systems, tools, and develop new products and services
- Manage, operate, and improve the performance of our Site and Services by understand their effectiveness and optimizing our digital assets.
- Analyze and advertise our products and services.
- Conduct aggregate analysis and develop business intelligence that enable us to operate, protect, make informed decisions, and report on the performance of our business.
- Ensure network and information security throughout KyckGlobal and our Services.
- Transmit Personal Data within our affiliates for internal administrative purposes.

If we need to use your Personal Data in other ways, we will provide specific notice at the time of collection and obtain your consent where required by applicable law.

How We Disclose Personal Data

KyckGlobal does not sell or rent Personal Data to marketers or unaffiliated third parties. We share your Personal Data with trusted entities, as outlined below.

We share Personal Data within KyckGlobal in order to provide our Services and for internal administration purposes.

We share Personal Data with a limited number of our service providers. We have service providers that provide services on our behalf, such as identity verification services, website hosting, data analysis, information technology and related infrastructure, customers service, email delivery, and auditing services. These providers may need to access Personal Data to perform their services. We authorize such services providers to use or disclose the Personal Data only as necessary to perform services on our behalf or comply with legal requirements. We require such services providers to contractually commit to protect the security and confidentiality of Personal Data they process on our behalf. Our service providers are located in the United States of America.

We share Personal Data with our business partners when this is necessary to provide our Services to our Users. Examples of third parties to whom we may disclose Personal Data for this purpose are banks and payment method providers when we provide payment processing services.

In the event that we enter into, or intend to enter into, a transaction that alters the structure of the business, such as a reorganization, merger, sales, joint venture, assignment, transfer, change of control, or other disposition of all or any portion of our business, assets or stock, we may share Personal Data with third parties for the purpose of facilitating and completing the transactions.

We share Personal Data as we believe necessary:

- To comply with applicable law or payment method rules.
- To enforce our contractual rights.
- To protect the rights, privacy, safety, and property of KyckGlobal, you or others.
- To respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities.



Your Rights and Choice

You have choices regarding our use and disclosure of your Personal Data:

1. How you can see or change your account Personal Data. If you would like to review, correct, or update Personal Data that you have previously disclosed to us, you may do so by signing in to your KyckGlobal account or by contacting us 404-228-5743.
2. Depending on your location and subject to applicable law, you may have the following rights regarding the Personal Data we control about you:
 - The right to request confirmation of whether KyckGlobal processes Personal Data relating to you, and if so, to request a copy of that Personal Data.
 - The right to request KyckGlobal rectifies or updates your Personal Data that is inaccurate, incomplete or outdated.
 - The right to request that KyckGlobal erase your Personal Data in certain circumstances provided by law.
3. Where the processing of your Personal Data is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your Personal Data on grounds relating to your situation.
4. In order to exercise your data protection rights, you may contact KyckGlobal as described in the Contact Us section below. We take each request seriously. We will comply with your request to the extent required by applicable law. We will not be able to respond to a request if we no longer hold your Personal Data. If you feel that you have not received satisfactory response from us, you may consult with the data protection authority.

For your protection, we may need to verify your identity before responding to the request, such as verifying that the email address from which you send the request matches your email address we have on file. If we no longer need to process Personal Data about you in order to provide our Services or our Site, we will not maintain, acquire or process additional information in order to identify you for the purpose of responding to your request.

Security and Retention

We make reasonable efforts to ensure a level of security appropriate to the risk associated with the processing of Personal Data. We maintain organization, technical and administrative measures designed to protect Personal Data within our organization against unauthorized access, destruction, loss, alteration or misuse. Your Personal Data is only accessible to a limited number of personnel who need access to the information to perform their duties. Unfortunately, no data transmissions or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interactions with us is no longer secure, (for example, if you feel that the security of your account has been compromised), please contact us immediately.

If you are a KyckGlobal user, we retain your Personal Data as long as we are providing the Services to you. We retain Personal Data after we cease providing Services to you, even if you close your KyckGlobal account, to the extent necessary to comply with our legal and regulatory obligations, and for the purpose of fraud monitoring, detection and prevention. We also retain Personal Data to comply with our tax, accounting, and financial reporting obligations, where we are required to retain the data by our contractual commitments to our financial partners, and where data retention is mandated by the payment methods that we support. Where we retain data, we do so in accordance with any limitation periods and records retention obligations that are imposed by applicable law.



Update to This Privacy Policy and Notifications

We may change this Privacy Policy from time to time to reflect new services, changes in our Personal Data practices or relevant laws. The "Effective Date" at the top of the Privacy Policy indicates when this Privacy Policy was last revised. Any changes are effective when we post the revised Privacy Policy. We may provide you with disclosures and alerts regarding the Privacy Policy or Personal Data collected by posting them on our website and, if you are a User, by contacting you through your KyckGlobal Dashboard, and/or email address.

Contact Us

If you have any questions or complaints about this Privacy Policy, please contact us electronically at info@kyckglobal.com or send physical mail to:

KyckGlobal, Inc
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3575 Piedmont Rd Ste P-120
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