

SERVICIOS BROXEL, S.A.P.I. DE C.V.

PRIVACY POLICY

I. EFFECTIVE DATE

December 6, 2019

II. PRIVACY REGULATION

The privacy provisions of the Gramm-Leach-Bliley Act ("GLBA") 15. U.S.C §§6801-6809 and its implementing regulations 16 CFR Part 313 require financial institutions to adhere to specific requirements concerning the protection and disclosure of non-public personal information ("NPI") about consumers and consumers of the institution. Since Servicios Broxel, S.A.P.I de C.V. ("BROXEL") offers money transmission and prepaid card services to US consumers, it is within the GLBA definition of a financial institution as it obtains nonpublic personal information from the consumers who use its services.

The GLBA requires financial institutions to explain their information-sharing practices to their consumers and to safeguard sensitive data. The GLBA regulates the sharing of personal information about individuals who obtain financial products or services from financial institutions. Under the GLBA, a "consumer" is defined as an individual, or that individual's legal representative, who obtains or has obtained a financial product or service from a financial institution that is to be used primarily for personal, family, or household purposes.

Broxel shares information for its own marketing purposes and for joint marketing with other financial companies such as the Issuing Bank and Program Manager for Broxel's prepaid card program. In addition, Broxel may also share U.S. consumers' personal information with its affiliates or nonaffiliates for marketing purposes. Broxel shares information with affiliates about consumers' transactions and experiences and creditworthiness for everyday business purposes as part of providing financial services with its affiliates. Broxel's Privacy Notice is therefore based on providing an opt-out for the consumer for information sharing related to marketing and creditworthiness with affiliates and marketing to nonaffiliates.

III. OUR COMMITMENT TO PRIVACY

BROXEL takes privacy very seriously and knows that you care about how your NPI is used and shared. As such, BROXEL is committed to protecting our consumers' privacy and security. This Privacy Policy explains how BROXEL may collect, process, retain, share, and transfer your NPI. This Policy explains what personal information is collected and the manner in which BROXEL may use and share such personal information. It also sets forth the options available to consumers if they seek to limit the use and sharing of their NPI.

IV. APPLICABILITY OF POLICY

This Privacy Policy applies to all information collected by BROXEL through BROXEL websites (for purposes of this Privacy Policy, "websites" includes www.broxel.com/us, our mobile websites, and our mobile applications) and the services associated with it ("BROXEL" or "Services"). This Privacy Policy applies to information related and retrieved in connection to the Service. You should read this Privacy Policy in its entirety as certain sections may apply differently to residents of different jurisdictions.

SERVICIOS BROXEL, S.A.P.I. DE C.V.

PRIVACY POLICY

BROXEL PRIVACY NOTICE

Effective Date: December 6, 2019

This Privacy Notice applies to you and information collected from you if you are an individual who resides in the United States and uses our Sites or Services for your own personal, family or household purposes.

FACTS	WHAT DOES BROXEL DO WITH YOUR PERSONAL INFORMATION?
WHY?	Financial companies choose how they share your personal information. Federal law gives consumers the right to limit some, but not all, sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.
WHAT?	<p>The types of personal information we collect, and share depend on the product or service you have with us. This information can include, but is not limited to, the following:</p> <ul style="list-style-type: none">• Domestic and foreign government issued identification numbers such as driver's license, passport, visa, social security number or tax identification number• Date of birth, email address, occupation, employer, mobile number, nationality, country of birth• Credit card, debit card, bank account and account balances information• Payment history or transaction history• Credit history or credit scores• Transactional profile, monthly transaction amount, frequency of transfers• Phone conversations and email communications• Internet protocol (IP) address, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data <p>You consent to our collection, transfer and storage of information by computers or other transfer or storage devices in the United States and elsewhere.</p> <p>When you are no longer our customer, we continue to share your information as described in this notice.</p>
HOW?	All financial companies need to share consumers' personal information to run their everyday business. In the section below, we list the reasons financial companies can share their consumers' personal information; the reasons Broxel chooses to share and whether you can limit this sharing.
WHEN?	This privacy statement was last revised on December 6, 2019

SERVICIOS BROXEL, S.A.P.I. DE C.V.

PRIVACY POLICY

Reasons we share your personal information	Does Broxel Share?	Can you limit this sharing?
For our everyday business purposes – such as to process your transactions, maintain your account(s), respond to court orders and legal investigations, or report to credit bureaus	Yes	No
For our marketing purposes – to offer our products and services to you or send you marketing and promotional messages	Yes	No
For joint marketing with other financial companies – to offer jointly marketed products and services to you or send you marketing and promotional messages	Yes	No
For our affiliates' everyday business purposes – information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes – information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	Yes	Yes

To limit our sharing	<ul style="list-style-type: none"> ● Call from the U.S. 1 855-279-2720, from Mexico 55-88-90-98-35 ● or the rest of the world 1 801-677-8612 —our menu will prompt you through your choice(s) ● Visit us online: www.broxel.com/us or ● Mail the form below <p>Please note:</p> <p>If you are a new consumer, we can begin sharing your information 30 days from the date we sent this notice. When you are no longer our customer, we continue to share your information as described in this notice.</p> <p>However, you can contact us at any time to limit our sharing .</p>
Questions?	<p>Call from the U.S. 1 855-279-2720, from Mexico 55-88-90-98-35 or the rest of the world 1 801-677-8612 or go to www.broxel.com/us for more information.</p>

SERVICIOS BROXEL, S.A.P.I. DE C.V.

PRIVACY POLICY

Mail-in Form

Mark any/all you want to limit:

- Do not share information about my creditworthiness with your affiliates for their everyday business purposes.
- Do not allow your affiliates to use my personal information to market to me.
- Do not share my personal information with nonaffiliates to market their products and services to me.

Name		Mail to: Servicios Broxel S.A.P.I. de C.V. 2700 Post Oak Blvd 21st. Floor Houston, TX 77056
City, State, Zip		

SERVICIOS BROXEL, S.A.P.I. DE C.V.

PRIVACY POLICY

Who we are	
Who is providing this Privacy Policy?	Servicios Broxel S.A.P.I de C.V. ("BROXEL")
What we do	
How does BROXEL protect my personal information?	<p>To protect your personal information from unauthorized access and use, we use security measures that comply with federal law.</p> <p>These measures can include physical, electronic, procedural, and computer safeguards and secured files and buildings. BROXEL also limits the sharing of personal information to only those employees that need access to it.</p>
How does BROXEL collect my personal information?	<p>We collect your personal information, for example, when you:</p> <ul style="list-style-type: none">● Register online● Provide account information or otherwise provide contact information● Conduct a transaction, complete a payment or use or request other products or services from us● Use your credit or debit card or provide bank account information● Use BROXEL online services to conduct a prepaid card transaction or to send or receive funds● Provide your government issued ID or tax identification number● Use or visit our online sites or navigate through mobile apps providing our services (for example, to complete a transaction or manage your account)● Communicate with our customer representatives via phone, online, or email <p>We also collect your personal information from others, such as credit bureaus, affiliates, non-affiliates, or other companies, all in compliance with and subject to the limitations of applicable law.</p>
Why can't I limit all sharing?	<p>Federal law gives you the right to limit only:</p> <ul style="list-style-type: none">● Sharing for affiliates' everyday business purposes – information about your creditworthiness● Sharing for affiliates to market to you● Sharing for nonaffiliates to market to you <p>State laws and individual companies may give you additional rights to limit sharing.</p>

SERVICIOS BROXEL, S.A.P.I. DE C.V.

PRIVACY POLICY

Definitions

Affiliates	Companies related by common ownership or control. They can be financial and nonfinancial companies. BROXEL TRANSFER, S. DE R.L. DE C.V.
Nonaffiliates	Companies that are not related by common ownership or control. These can be financial and nonfinancial companies. Insurance Company
Joint marketing	A formal agreement between nonaffiliated financial companies that together market financial products or services to you. MCB

Other Important Information

State Privacy Laws

California residents: In accordance with California law, we will not share information we collect about you with companies outside of Broxel except as required or permitted by law. For example, we may share information to service your accounts, complete requested transactions, or to provide rewards or benefits to which you are entitled.

Nevada residents: This notice is provided to you pursuant to state law. Nevada state privacy laws permit us to make marketing calls to existing customers, but if you prefer not to receive marketing calls, you may be placed on our internal opt-out list by calling us at 1 855-279-2720 or you may also contact the Nevada Bureau of Consumer Protection, Office of the Nevada Attorney General, 555 E. Washington St., Ste 3900, Las Vegas, NV 89101; telephone 702-486-3132; email: BCPINFO@ag.state.nv.us.

Texas residents: If you have a complaint, first contact Broxel at 1 855-279-2720. If you still have an unresolved complaint regarding the company's money transmission or currency exchange activity, please direct your complaint to the Texas Department of Banking: 2601 North Lamar Boulevard, Austin, TX 78705-4294; 1-877-276-5554 (toll free); www.dob.texas.gov.

Vermont residents: In accordance with Vermont law, we will not share information we collect about you with companies outside of Broxel except as required or permitted by law. For example, we may share information to service your accounts, complete requested transactions, or to provide rewards or benefits to which you are entitled.

CHILDREN'S POLICY

Our website is not directed at children under the age of 13. Broxel does not knowingly collect or maintain information from persons under the age of 13. If we become aware that we have collected NPI from a child under the age of 13, we will promptly delete it, unless we are legally obligated to retain such data. Contact us if you believe that we have inadvertently collected information from a child under the age of 13.

EXTERNAL WEBSITES

Our website may be linked to or from third party websites. Broxel is not responsible for the content or privacy practices of websites that are linked to or from our website.

COOKIES

Some of our web pages may contain “cookies”, small data files which are sent to your web browser and stored on your computer or mobile device to, among other things, allow us to recognize you as a returning customer and log your browsing trends and remember your website preferences to make your experience more convenient and personal. Cookies may also be used for future analysis by us or third parties to analyze trends, optimize website use, and to learn more about customer preferences which altogether help us improve our products and services. You may configure your web browser to not accept cookies or to notify you if a cookie is sent to you. Disabling cookies may limit functionality of our websites and/or applications and may also impact service levels.

ONLINE ACTIVITIES

Broxel does not honor any web browser “do not track” signals or other mechanisms that provide consumers the ability to exercise choice regarding the collection of personal information about an individual consumer’s online activities over time and across third-party websites or online services.

CHANGES

Broxel reserves the right to modify this Privacy Statement. To the extent required by applicable law, we will notify you and give you the opportunity to opt out of any material change in the way we use or disclose personal information you previously have provided. You can get an updated Privacy Statement by calling us at Call from the U.S. 1 855-279-2720, from Mexico 55-88-90-98-35 or the rest of the world 1 801-677-8612 or email to dataprotection@broxel.com or by visiting our website at www.broxel.com/us