

## **OUR PRIVACY POLICY**

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Last Updated: October 2016

Welcome to the website of Continental Exchange Solutions, Inc. doing business as HiFX (“HiFX”), [www.transfer.xe.com](http://www.transfer.xe.com). Protecting your privacy is very important to us. Therefore the intent of this policy is to inform you about our collection and use of your personal and non-personal information in connection with our services (“Services”). This policy is applicable to all HiFX consumers and visitors who visit our website. <http://www.transfer.xe.com>.

### **Personal Information**

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In order to provide our Services, HiFX collects and may disclose certain personal and non-personal information we receive from you on registration or transaction forms about you and the recipient of the funds transfer, such as name, address, phone number and financial account information. We also receive information about your transactions with us or others. In addition, depending on the services requested and/or the amount of your money transfer, HiFX may also collect and may disclose personal and non-personal information, such as date of birth, social security number or other identifying number (including type, issuer, and expiration date), credit card information (including type, number and expiration date), proof of address (such as a bank statement or utility bill) and any other information necessary to verify and process the request.

We (or our service providers acting on our behalf) may collect personal information about your use of our Services. This information may include information that may identify you as well as statistical information that does not identify you. In addition, web log information is automatically gathered every time you visit the website. It gathers non personal identifying information such as Internet browser type, IP address, date and time stamps associated with transactions, and the pages you visited (see the use of “Cookies” below).

### **Cookies**

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A cookie is a piece of text information that a web server may transfer to your web browser when you visit this website. Cookies are commonly used by websites to improve your experience and to enable systems to recognize your browsers. Only the information that you provide, or the choices you make while visiting a website, can be stored in a cookie. For example, the site cannot determine your e-mail name unless you choose to type it. Allowing a website to create a cookie does not give that or any other site access to the rest of your computer and only the site that created the cookie can interpret it.

We may use cookies for a variety of purposes: to assist us in providing our Services to you, to allow you to change pages during your visit to our website without reentering your password, to track activity on our website, or to determine whether you came to our site from an affiliate website. We may use temporary, session cookies that expire and are automatically erased when you close your browser window to enable you to perform actions when you are signed into your account. We may use long term, persistent cookies that expire in the distant future to better understand usage patterns so that we can improve our Services or to remember your choices for our Services. We may permit third parties to place cookies through our website to provide us with better insights into the use of our Services and user demographics or to provide relevant advertising to you. These third parties may collect information about your online activities over time and across different websites when you use our Services.

By accessing or using our Services, you consent to the placement of cookies on your computer or other device as described in this policy. You may adjust your browser settings to refuse or limit cookies, but if you do, certain features of our site may be limited or not work at all. To learn more about cookies, visit [www.allaboutcookies.org/manage-cookies](http://www.allaboutcookies.org/manage-cookies).

Do Not Track (“DNT”) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third parties. We do not use technology that recognizes DNT signals from your web browser.

### **Google Analytics**

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We use a tool called “Google Analytics” to collect information about use of this site. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. We use the information we get from Google Analytics only to improve this site. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name

or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google's ability to use and share information collected by Google Analytics about your visits to this site is restricted by the Google Analytics Terms of Use and the Google Privacy Policy. You may opt out of Google Analytics by visiting the Google Analytics opt-out page.

## **Use of Information**

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The use of your information is subject to this policy and our Terms and Conditions. The provisions contained here supersede all previous notices or statements regarding our privacy practices. We may use your personal information and non-personal information internally for our general commercial purposes, including, among other things, to offer our products and services and the products and services of third parties that we think you might find of interest. We may use your contact information, including your email and telephone number to respond to inquiries or to provide you information about our Services or your account. You may elect not to receive promotional emails from us by following the "unsubscribe" instructions in any email you receive. If you unsubscribe, we may still send you non-promotional emails, such as emails about your account or our ongoing business relations.

HiFX does not disclose nonpublic personal information about its consumers or former consumers to anyone, except as permitted by law. The law permits disclosure of nonpublic personal information to unaffiliated third parties, for example, (1) where it is necessary to effect, administer, or enforce a transaction requested or authorized by the consumer, or in connection with the servicing or processing of a financial product or service requested or authorized by the consumer. (2) Where it is released to protect the confidentiality or security of our records pertaining to our consumers, the services or products we offer, or the transactions we process or handle., (3) to protect against or prevent actual or potential fraud, identity theft, unauthorized transactions, claims or other liability, as well as for resolving consumer disputes or inquiries., (4) to comply with federal, state or local laws or regulations or other legal requirements, such as subpoenas or other legal processes, .or (5) if you request or authorize it. This list of examples of the types of sharing of information that is permitted by law is not meant to be comprehensive, but provides you with some basic information on some of the types of sharing permitted by law.

HiFX may send you information concerning products or services which you use and other HiFX products or services which we think may be of interest to you. This may include information concerning promotions or offers which could benefit you. If you would prefer not to receive information concerning products or services which we think may be of interest to you, including special offers and promotions, then please indicate by checking the relevant box when prompted during your registration process or thereafter please contact us at [transfers.na@xe.com](mailto:transfers.na@xe.com) to update your preferences.

HiFX does not sell or exchange consumer lists or consumer information with third parties for marketing purposes. We may disclose your public, aggregated or otherwise non personal information, such as usage statistics, for example, to third parties.

## **Safeguards to Protect Privacy**

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HiFX takes precautions to protect the information of our consumers. We maintain physical, electronic and procedural safeguards in an effort to secure your nonpublic personal information. When you enter sensitive or private consumer information, the information is encrypted and protected using physical, technical, and administrative security measures to reduce the risks of loss, misuse, unauthorized access, disclosure and alteration. HiFX's database of consumer information resides on HiFX's servers behind various firewalls to protect against loss, misuse, theft, and unauthorized modification, deletion, or alteration of the information contained in the database.

HiFX has undertaken preventative measures to restrict access to sensitive data and private information. Only those employees and agents who need to know that information to provide services related to the foreign exchange transactions and/or the processing of fund transfers are granted access to personal information. Although HiFX measures conform to those of the industry, HiFX makes no claim or warranty as to the security or impenetrability of HiFX's system under unusual circumstances or its resilience to future sophisticated attacks.

You also play a role in protecting your personal information. Please safeguard your username and password for your account and do not share them with others. If we receive instructions using your account sign-in information, we will consider that you have authorized the instructions. You agree to notify us immediately of any unauthorized use of your account or any other breach of security.

### **Privacy Practices of Third Parties**

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Our website may feature links to third party sites that offer goods, services, or information. We are not responsible for content, privacy policies or the practices of any linked sites of these third parties. We encourage you to review each privacy policy before providing any personal information. We may receive information about you, for instance from a consumer reporting agency or from another financial institution when you use our Services.

### **User Access, Change or Deletion of Private Information**

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Consumers using HiFX's website can change, edit, delete or update their private information at any time by going to the HiFX website, logging in, and clicking on "My Account."

### **Information of Minors and Children**

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From our website, we do not knowingly target, collect or use personal information from children under 13. Children under 13 should not use this site. If you are under 18, you should get permission from a parent before using our Services or website.

For more information about the Children's Online Privacy Protection Act (COPPA), visit the FTC website: [www.ftc.gov](http://www.ftc.gov).

### **Questions**

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If you have any questions regarding this Privacy Policy, please contact HiFX customer service at 1 877 932 6640