

## ONLINE PRIVACY NOTICE

November 1, 2018

Fidelity National Information Services, Inc. (its subsidiaries and affiliates, collectively “FIS”) recognizes and respects the privacy expectations of today’s consumers and the requirements of applicable regulations in protecting their online privacy. FIS believes that making you aware of how we use your personal information, including sensitive personal information, as discussed further below, and to whom it is disclosed, will form the basis for a relationship of trust with the public that we serve.

FIS is compelled to safeguard your privacy rights with respect to any data or information we receive that identifies you or is identifiable to you. For purposes of this Notice, we will call such data or information “personal data”. Personal data will always be collected, used, and disclosed by FIS in accordance with the requirements and prohibitions of applicable laws or regulations.

This Notice explains how we collect, use, store and share the personal data you provide us on FIS websites. If you use any FIS websites, you agree your use of these websites is subject to the terms of this Online Privacy Notice, the Terms of Use and also subject to the terms of any other agreement you, or where appropriate, your employer or other person or company you are representing, may have with FIS.

The FIS Online Privacy Notice was developed not only to safeguard our clients’ privacy but also to provide assurance that your privacy is of paramount importance to us. For further information, please review the FIS Privacy Policy and Privacy Shield Consumer Notice which explain FIS’s data collection and usage practices in greater detail.

### **WHAT:**

#### **What kind of personal information does FIS collect online?**

In the course of our business, FIS may collect personal data about you from the following sources:

- from applications or other forms we receive from you or your authorized representative;
- from our internet websites;
- from public sources such as vendors who may provide personal data needed for money laundering and trade sanctions compliance, so FIS may confirm you are not listed as a restricted party with whom FIS is legally prohibited from doing business; and
- from any mobile websites or applications you visit.

### **HOW:**

#### **How does FIS safeguard the personal data FIS collects?**

- FIS maintains physical, electronic, and procedural safeguards designed to protect your personal data from unauthorized access or intrusion. FIS limits access to the personal data only to those employees, contractors and agents who need such access in connection with providing products or services to you, to

clients with whom you have a relationship, or for other legitimate business purposes. Some of these measures may include encryption, physical access security, user access security measures or other technologies and tools which FIS believes may enhance the security of its systems and facilities. However, FIS has no responsibility or liability for the security of information you provide to FIS transmitted via the Internet.

- FIS employees and contractors receive annual training regarding FIS' privacy and information security policies and procedures. FIS understands that protecting consumer privacy is an integral part of protecting our relationship with our clients.

## How does FIS use the personal data collected?

- FIS uses the data we collect to assist us in providing products or services to you, to our clients, to provide you with information about those products or for other legitimate business purposes.
- FIS does not seek to determine your identity when you simply browse our site; however, if you provide FIS with your contact information, such as by completing an online form or providing information in a job application, FIS will know your identity.
- FIS may use cookies to aggregate information about the web pages you visit, so FIS can update or enhance our services. FIS does not provide your domain name to third parties, other than to the vendors, such as those with whom we contract for website design and maintenance. These vendors are under contractual confidentiality requirements.
- FIS may disclose your personal data if regulatory obligations require FIS to do so, if FIS determines such disclosure is legally advisable or necessary in order to protect FIS' rights, the rights of others, or in order to prevent harm.
- FIS will process your personal data to assure FIS compliance with applicable laws. For example, for fraud prevention purposes, we may confirm your IP address matches the location you enter into our online forms, and for money laundering and trade sanctions compliance, FIS may confirm you are not listed as a restricted party with whom FIS is legally prohibited from doing business.
- We will only retain your data for as long as is necessary and in accordance with applicable law. We set out our retention periods within our company policies.

## What is the legal basis for processing your personal data?

- FIS collects, uses, stores and otherwise processes personal data where necessary to provide a service which you request, where necessary to comply with a legal obligation, and where necessary pursuant to FIS' legitimate interests and where these interests are not overridden by your data protection rights. For example, FIS has a legitimate interest in ensuring the security and integrity of its systems and facilities and in ensuring that relevant information for the conduct of our business is available across the FIS group. FIS may also process your personal data where you have given consent. For example, when you fill in an online form or request more information about FIS products or services, you consent to FIS using your personal data as requested. Where FIS asks for consent, you are free to withhold or revoke it.

## WHO:

### Who has access to the personal information FIS collects?

- FIS limits access to personal information to those employees, contractors, business partners or agents who require such access in connection with providing products or services to you or for other legitimate business purposes.

### With whom does FIS share the personal information we collect?

Where appropriate or necessary to do so, FIS may share your personal data among our affiliated group of companies. FIS also may disclose your personal data:

- to agents, brokers, business partners or representatives to provide you with services you have requested;
- to third-party contractors or service providers to enable us to provide services or other functions to you or to a client of FIS whose services you have requested;
- to regulatory authorities or public authorities to meet our legal requirements connected to the collection, retention and disclosure of personal data, such as tax reporting or identification of money laundering;
- to law enforcement in connection with investigations, or civil or criminal subpoenas or court orders;
- to a prospective buyer or seller in the event FIS sells or buys any business or assets;
- FIS will disclose your personal data when you direct or give us permission to do so, when we are required by law to do so, or when we suspect fraudulent or criminal activities; and
- FIS may also disclose your personal data when otherwise permitted by applicable privacy laws, such as when disclosure is required to enforce our rights arising out of any agreement, transaction, or relationship with you or another party.

## OTHER THINGS YOU NEED TO KNOW:

### FIS website(s) are not directed at persons under the age of 18

- FIS website(s) are not directed at persons under the age of 18. FIS does not knowingly collect, maintain or use personal data from persons under the age of 18 on any FIS website. If you are under the age of 18 years, please do not register or otherwise provide information to FIS on an FIS website.

### FIS' use of Cookies on website(s)

#### What are cookies?

- Cookies are text files containing small amounts of information which are downloaded to your computer or mobile device when you visit a website. Cookies are then sent back to the originating website on each subsequent visit, or to another website that recognizes that cookie. Cookies are useful because they allow a website to recognize a user's device. For more information on FIS' use of cookies and your options, visit the FIS Cookie Notification page. You can also find more information about cookies at: [www.allaboutcookies.org](http://www.allaboutcookies.org) and [www.youronlinechoices.eu](http://www.youronlinechoices.eu).

- Cookies do many different jobs, such as allowing you to navigate between pages efficiently, remembering your preferences, and generally improving the user experience. They can also help to verify the advertisements and other content you see online are more relevant to you and your interests. They can be set by the website you are visiting (known as first party cookies), or by another entity such as an advertising network (known as third party cookies). The cookies used on this website have been categorized on the basis of the four categories found in the International Chamber of Commerce United Kingdom (ICC UK) Cookie guide. We use the following types of cookies:
  - ‘Session’ cookies remain in your browser during your browser session only (e.g. until you leave the website).
  - ‘Persistent’ cookies remain in your browser after the session (unless deleted by you).
  - ‘Performance’ cookies collect information about your use of the website, such as webpages visited and any error messages you receive. The information they collect is aggregated and is not used to directly identify any particular visitor. Performance cookies are used to improve how a website works.
  - ‘Functionality’ cookies allow the website to remember any choices you make about the website (such as changes to text size, or customized pages) and enable services such as commenting on a blog.
- Some of these cookies are provided by third parties. For example, we use Google analytics cookies to allow us to analyse statistics on the numbers of visitors to our websites and how users interact with different features on the websites. We also use social media cookies to construct visitor interest models and assess user habits. These cookies are also used to show you relevant advertising.

## What if I don’t want cookies?

- By using FIS’ website you agree we can place cookies and other similar technologies on your device as explained above. If you want to remove existing cookies from your device, you can do this using your browser options. If you want to block future cookies being placed on your device, you can change your browser settings to do this. When you review your browser settings or options, you can identify the FIS cookies by the fact they include “FIS” in the name. For more information on managing cookies, see [www.allaboutcookies.org/manage-cookies](http://www.allaboutcookies.org/manage-cookies) or [www.youronlinechoices.com/](http://www.youronlinechoices.com/)

## How does FIS respond to “Do Not Track” signals?

- Current “Do Not Track” initiatives are not recognized by our website.
- No other parties that are not FIS are authorized by FIS to track users of FIS websites.

## FIS websites may be linked to other websites

FIS websites may contain links to other sites. As you navigate this site, you may click on links that take you to websites that belong to other business units or business partners affiliated with FIS. In addition, we may include links on FIS sites that are third-party websites, which are not business units or FIS affiliates. FIS is not responsible for the content or privacy practices of other non-FIS websites to which FIS’ websites may link. If you are asked to provide information on one of these sites, we urge you to carefully review their privacy policies before sharing.

## Transfer of personal data to other countries

FIS is a global enterprise, and so for aggregation and efficiency purposes, FIS may transfer data it collects in one country to a different country. FIS will utilize protection method(s) it determines appropriate and lawful when transferring your data across international borders. These methods may consist of Model Contracts, Privacy Shield, Binding Corporate Rules or other schemes that continue to meet FIS' commitment in protecting the privacy of your personal data. However, the laws of all countries may not protect your personal data or provide to you the same rights as the privacy laws of your home country.

## Managing your preferences

You may opt-out of receiving communications about FIS products and services by visiting our [Subscription Preference Center](#) at any time.

## Government Information on Privacy

For other valuable consumer information, including information on protecting yourself from identity theft and fraud, visit the following sites:

- United States: [www.consumer.gov](http://www.consumer.gov)
- Australia: [www.oaic.gov.au](http://www.oaic.gov.au)
- Canada: [www.priv.gc.ca/index\\_e.asp](http://www.priv.gc.ca/index_e.asp)
- Hong Kong: [www.pcpd.org.hk/](http://www.pcpd.org.hk/)
- Korea: [www.pipc.go.kr/](http://www.pipc.go.kr/)
- Europe: <http://ec.europa.eu/justice/data-protection/>
- Japan: [www.ppc.go.jp/en/](http://www.ppc.go.jp/en/)
- United Kingdom: <https://ico.org.uk/for-the-public/>

## Your Rights

### What rights do I have with respect to my personal data that FIS may have collected?

- The laws of certain jurisdictions may afford you the right to access your personal data held by FIS and to request correction, amendment, portability or deletion of your personal data held by FIS. In addition, where applicable, you may have the right to object to processing based on legitimate interests and to withdraw consent where consent forms the legal basis for processing. These rights may be limited, for example if fulfilling a request would reveal personal data about another person, or if the processing is required by law or another compelling legitimate interest. If you have unresolved concerns, you have the right to complain to a data protection authority. FIS reserves the right, where permitted by law, to verify your identity, to refuse such requests where appropriate, and to charge a reasonable fee to cover the costs incurred in responding to such requests.

- In some circumstances, FIS processes personal data on behalf of its clients and subject to the control and instructions of its clients. If you believe FIS may have personal data about you due to services FIS is providing or has provided to an FIS client with whom you have a relationship, it may not be possible for FIS to respond to your request. In that circumstance, it would be more appropriate for you to direct your request to the FIS client with whom you have the relationship.

Requests to FIS may be made in writing to the following address:

### **Chief Privacy Officer**

FIS  
601 Riverside Avenue  
Jacksonville, FL 32204

[privacyoffice@fisglobal.com](mailto:privacyoffice@fisglobal.com)

- If you are based in the European Economic Area (EEA) or Switzerland, you may contact our Data Protection Officer at the following address:

### **Data Protection Officer**

FIS  
25 Canada Square, Canary Wharf  
London E14 5LQ  
United Kingdom

[data.protection@fisglobal.com](mailto:data.protection@fisglobal.com)

## **Online Privacy Notice Updates**

- This Online Privacy Notice is subject to change. Please review this Notice periodically. Any changes will become effective when we post the revised Notice on the site (please note effective date listed at top). Your use of the site following these changes means that you accept the revised Notice.