

## SIUPREM Privacy Policy – October 7, 2017

This privacy policy governs your use of the software application (“SIUPREM”) for mobile devices that was created by Howard Day & Associates Inc. The Application allows clients of SIUPREM to check their account status, make payments and contact us.

### **What information does the Application obtain and how is it used?**

When making account inquiries you will be asked for your account number and account zip code. This information allows us to complete a query and return account information. This data is not stored and remains on our processing platform only long enough to complete your query.

### **User Provided Information**

Clients making account inquiries are required to provide us the account number and account zip code. We use this information to complete account inquiries. You may choose to have the app store the account number and account zip code by placing a check mark next to “save information”. When the check mark is present the information is stored on your telephone and allows us to populate those fields automatically during subsequent use.

When choosing to make a payment, the app will open a browser window to our 3<sup>rd</sup> party payment service, Western Union’s Speed Pay. The information this 3<sup>rd</sup> party service collects is independent of our app and Western Union’s Speed Pay service is solely responsible for its collection and use of data.

### **Automatically Collected Information**

We do not collect automatically generated data such as device ID, device type.

### **Does the Application collect precise real time location information of the device?**

This Application does not collect precise information about the location of your mobile device.

### **Do third parties see and/or have access to information obtained by the Application?**

When selecting to make a payment on-line through the app we provide Western Union’s Speed Pay the account number and account zip code you provided to us.

Only aggregated, anonymized data is periodically transmitted to external services to help us improve the Application and our service. We will share your information with third parties only in the ways that are described in this privacy statement.

We may disclose User Provided and Automatically Collected Information:

- as required by law, such as to comply with a subpoena, or similar legal process;
- when we believe in good faith that disclosure is necessary to protect our rights, protect your safety or the safety of others, investigate fraud, or respond to a government request;
- with our trusted services providers who work on our behalf, do not have an independent use of the information we disclose to them, and have agreed to adhere to the rules set forth in this privacy statement.

### **What are my opt-out rights?**

You may use the standard uninstall processes as may be available as part of your mobile device

### **Data Retention Policy, Managing Your Information**

We will retain Automatically Collected information for up to 24 months and thereafter may store it in aggregate.

### **Security**

We are concerned about safeguarding the confidentiality of your information. We provide physical, electronic, and procedural safeguards to protect information we process and maintain. For example, we limit access to this information to authorized employees and contractors who need to know that information in order to operate, develop or improve our Application. Please be aware that, although we endeavor provide reasonable security for information we process and maintain, no security system can prevent all potential security breaches.

### **Changes**

This Privacy Policy may be updated from time to time for any reason. We will notify you of any changes to our Privacy Policy by posting the new Privacy Policy here. You are advised to consult this Privacy Policy regularly for any changes, as continued use is deemed approval of all changes.

### **Your Consent**

By using the Application, you are consenting to our processing of your information as set forth in this Privacy Policy now and as amended by us. "Processing," means using cookies on a

computer/hand held device or using or touching information in any way, including, but not limited to, collecting, storing, deleting, using, combining and disclosing information, all of which activities will take place in the United States. If you reside outside the United States your information will be transferred, processed and stored there under United States privacy standards.

### **Contact us**

If you have any questions regarding privacy while using the Application, or have questions about our practices, please contact us via email at [info@Siuprem.com](mailto:info@Siuprem.com)