



**Currency Exchange International, Corp.**  
**Privacy Notice**

**Last updated November 28, 2023**

Currency Exchange International, Corp. ("CXI", "we", or "us") is committed to protecting the privacy and security of personal information in its possession or custody. This Privacy Notice explains what information about you we collect, use, disclose, store, retain, or otherwise process when you request or obtain our products or services, use our website, and otherwise interact with us (collectively the "Services").

This Privacy Notice applies to current and prospective consumers of CXI and visitors to the websites and applications that facilitate the offering of such Services.

We may amend this Privacy Notice at any time by posting a revised version on our website. Unless otherwise stated, the revised version will be effective at the time we post it. We recommend you visit this page regularly to be kept aware of any changes.

Our Privacy Notice explains:

Information We Collect  
How We Use Information  
How We Disclose Information  
How Long We Keep your Information  
How We Secure Information  
Information Choices  
Special Information For California Residents  
Special Information For Individuals in the EU/UK  
Children's Privacy  
Contact Us

**1. Information We Collect**

This section describes our practices when you interact with CXI in connection with one of the products we offer, or otherwise access CXI's websites. Information obtained by CXI from an individual consumer of a financial product or service offered by CXI is subject to special regulations and exemptions. CXI is subject to federal privacy obligations under the Gramm-Leach-Bliley-Act ("GLBA") and, as such, information collected by CXI from you which is covered by the GLBA is exempt from the obligations set forth in this Notice. For more information, please see our [GLBA Notice](#).

**1.1. Information You Provide to Us.** If you communicate with us or use the Services, we may collect the following types of information:

- *Individual contact information:* This includes your name, email address, physical address, shipping address, and telephone number.
- *Business contact information:* This includes business name, physical address, email address, and telephone number. We may also receive this information from the business you represent.
- *Account information:* This includes username, password, and marketing preferences.
- *Financial information:* This may include your transaction history, source of funds, bank account details including, routing numbers and/or debit card numbers and credit card numbers that you link to your CXI account or you give us when you use our Services. For business consumers, this may include applicable financial statements.



- *Commercial information:* This may include information on the services or products purchased through CXI and the purpose of a particular transaction.
- *Identity information:* This includes information you provide to verify your identity for certain transactions, including your Social Security number, driver's license number, passport, tax identification number, and date of birth.
- *Customer service interactions:* This includes information you provide when you engage with CXI's customer service, including through recorded calls, surveys, and email correspondence.
- *Location information:* This includes your IP address and approximate geolocation obtained from the location of your device.
- *Employment information:* For certain transactions, we will need to collect your occupation for verification.
- *Application information:* If you apply for employment with CXI, we will collect your job application materials, resume, employment history, education history, and certifications and licenses held.
- *Sensory data:* If you visit a CXI location, video of you will be captured by our CCTV footage.

**1.2. Information Obtained From Third Parties.** We may obtain information about you from third parties, such as identity verification and fraud prevention vendors. For business consumers, we may also obtain credit reports from consumer reporting agencies in connection with the use of certain Services we may offer you or that you may obtain from us.

**1.3. Information We Learn From You.** When you interact with our website, certain information about you is automatically collected via cookies and similar technologies (referred to collectively herein as cookies). Cookies are small text files that are stored within your device's memory by a website. Cookies enable a website such as ours to keep track of your activities to improve user experience, advertise our Services, and facilitate important security features. Some cookies may be hosted on third-party systems. The cookies on our website collect the following information:

- *Usage details* about your interaction with our Services, such as which pages you access, frequency of access, what you click on, search terms, date and length of visits, and referring website addresses.
- *Device information*, including the IP address and other details of a device that you use to connect with our Services, such as device type and unique device identifier, hardware model, operating system, browser, mobile network information, mobile carrier, and the device's telephone number.
- *Location information* where you choose to provide us with access to information about your device's location, including information on nearby devices and Wi-Fi access points.

We use the information collected via cookies to understand our consumer base, advertise our Services to you and other prospective consumers, monitor the performance of our Services, improve the user experience, and to ensure the security of our Services.

We use Google Analytics to conduct analytics and to collect information about usage of the Services. You can learn more about privacy and Google Analytics [here](#). In general terms, Google Analytics collects information on how often users visit the Services, what pages or features of the Services they use, and what other websites users visited prior to accessing the Services. You may prevent your data from being collected and used by Google Analytics by opting out through the use of the [Google Analytics Opt-out Browser Add-on](#).

We also use Google Ads and Facebook Pixel to customize our advertising and to serve you ads based on your browsing behavior. These partners use cookies to serve you ads based on your prior visits to our Services and other websites on the internet. These



cookies allow your behavior to be tracked after you have been redirected to our Services by clicking on an ad. You can learn more about Google Ads [here](#). You can opt-out of personalized advertising from Google by visiting [Ad Settings](#). You can learn more about Facebook Pixel [here](#). You can opt-out of displaying Facebook ads and sharing by visiting your Facebook [Ad Settings](#), and you can clear and control the information third parties share with Facebook in your [Off-Facebook Activity](#) page.

Please note we use other cookies for the above described purposes. To get more information on these cookies and to select your preferences, visit our cookie management platform.

## 2. How We Use Information

CXI may use your information for any of the following purposes:

- *Provide the Services:* Establish and provide the requested Services; create and maintain your account; process and manage your transactions.
- *Improve the Services and grow CXI:* Understand our consumer base; conduct testing, research, analysis, and product development; improve the Services.
- *Respond to your inquiries:* Provide support and respond to your questions, inquiries, or other requests; monitor and improve our responses.
- *Send communications:* Provide account updates or information on your transaction; inform you of any changes to the Services.
- *Offer, maintain, and improve online Services:* Monitor the performance of the Services; improve the Services; ensure the security of the Services; personalize your experience and your account.
- *Market to you:* Deliver content and service offerings that may be of interest to you.
- *Comply with legal and regulatory obligations:* Comply with our legal and regulatory requirements or in connection with inquiries from regulators, law enforcement agencies, or parties involved in litigation; engage in risk management activities.
- *Protect our rights and the rights of others:* Establish, protect, or exercise our legal rights; as required to enforce contracts; maintain the safety, security, and integrity of our Services; defend against legal claims or demands; detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.
- *To process your application:* To assess and manage your application; conduct reference checks; assess your suitability for a role for which you have applied; monitor compliance with equal opportunities and non-discrimination policies.

## 3. How We Disclose Information

CXI may disclose your personal information as follows:

- *With the CXI group of companies:* We may disclose information collected from or about you with our group of companies and corporate affiliates for the business purposes outlined above.
- *With service providers* that perform business functions on our behalf, such as companies that assist with payment processing, analytics, shipping, fraud prevention, data processing and management, regulatory compliance and auditing, account management hosting, customer and technical support, and marketing.



- *With advertising and measurement partners* who assist us in serving advertisements regarding the Services. These third parties use tracking technologies on the Services to collect or receive information from the Services and elsewhere on the internet and use that information to provide measurement services and target ads. Third parties may allow other companies to access information about you so that they may market other products you may be interested in.
- *To prevent harm* or if we believe it is necessary in order to detect, investigate, prevent, or take action against illegal activities, fraud, or situations involving potential threats to the rights, property, or personal safety of any person.
- *When required by law* and when we are legally required to do so, such as in response to or in compliance with court or regulatory agency orders, legal proceedings, or legal process; to exercise our legal rights; to enforce our Terms and Conditions or other applicable agreements or policies; to defend against legal claims or demands; or to comply with the requirements of any applicable law.
- *As part of a business transaction* with another entity in connection with a contemplated or actual reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).

#### **4. How Long We Keep Your Information**

CXI will retain your personal information for as long as is necessary to complete the purposes for which it was collected, or as may be required by law. California law requires us to provide information regarding the criteria we use to determine the length of time for which we retain personal information.

We utilize the following criteria to determine the length of time for which we retain information:

- The business purposes for which the information is used, and the length of time for which the information is required to achieve those purposes;
- Whether we are required to retain the information type in order to comply with legal obligations or contractual commitments, to defend against potential legal claims, or as otherwise necessary to investigate theft or other activities potentially in violation of CXI's policies and procedures applicable to you or against the law, to ensure a secure online environment, or to protect health and safety;
- The privacy impact of ongoing retention on the consumer; and
- The manner in which information is maintained and flows through our systems, and how best to manage the lifecycle of information in light of the volume and complexity of the systems in our infrastructure.

Individual pieces of personal information may exist in different systems that are used for different business or legal purposes. A different maximum retention period may apply to each use case of the information. Certain individual pieces of information may also be stored in combination with other individual pieces of information, and the maximum retention period may be determined by the purpose for which that information set is used. For more information on how we apply retention criteria, please see Special Information for California Residents.

#### **5. How We Secure Information**

CXI takes a variety of measures, including administrative, technical, and physical safeguards, to protect your information from loss, theft, and misuse, and unauthorized access, disclosure, alteration, and destruction. For example, we take steps to limit access to information to those CXI employees, agents, and contractors who have legitimate business reason to access such information. We also use measures like encryption and hashing to help protect information when in transmission. Nevertheless, the internet is not a 100% secure environment, and we cannot guarantee absolute security of the transmission or storage of your information.



## 6. Information Choices

- *Access or correct your information:* You can correct and view certain information of yours and which is associated with your account at any time through your CXI account.
- *Notification and marketing preferences:* You may change your notification preferences at any time by logging into your account and adjusting your preferences. You can also click the unsubscribe link at the bottom of any email or contact us through the Contact Us form by selecting "Privacy" for the "Reason for contacting us". Even after you have unsubscribed, you will still receive email communications that provide information and updates from CXI related to your transactions or other important information.
- *Preferences regarding automatic collection of information on our website or application:*
  - You can opt out or set preferences regarding cookies through our cookie management platform.
  - You can set your browser to refuse cookies or indicate when a cookie is being sent. If you are visiting the Services from a mobile device, the operating system of the device may offer you options regarding how the device collects and uses your information for interest-based advertising.
  - Visit the [Network Advertising Initiative](#) or the [Digital Advertising Alliance](#) to learn more about your options for opting out of the use of your information by certain companies to deliver interest-based advertising.
  - If your browser offers you the ability to use the Global Privacy Control (GPC) to communicate your privacy preferences to us, we honor such signals. Please note, however, that our Services are not currently configured to respond to "Do Not Track" signals.

## 7. Special Information For California Residents

If you are a California resident, you have the right under the California Consumer Privacy Act ("CCPA") to receive notice of the categories of personal information we collect, the purposes for which those categories of personal information will be used, how we share the personal information, and how we determine the length of time for which the personal information is maintained. You are also entitled to receive notice regarding your rights under the CCPA.

How to read the below charts:

- The categories we use to describe the information are those listed in the CCPA. Certain personal information may fall into multiple categories. Some of the categories include very different types of information. As a result, how we use and how long we keep the information within each category will vary. The examples of personal information listed below are illustrative and do not represent a complete description of the information we process.
- The chart also lists the categories of third parties to whom we "sell" or "share" personal information. Under the CCPA, a business "sells" personal information when it discloses it to a company for monetary or other benefit.
- We are required to list service providers to whom we disclose information to conduct activities on our behalf. These service providers are restricted from using personal information from any purpose that is not related to our engagement.
- If a category of personal information is not listed, we do not collect it.

*Collection, Use, and Sharing - Business Contacts*



We collect personal information subject to the CCPA when we interact with an employee, representative, or agent of a business customer, vendor, or other business entity located in California. This disclosure covers the information that may be collected about you and not about the business on whose behalf you interact with us.

Category	Required Information
Identifiers	<p><i>Name, email address, phone number, business or other contact address</i></p> <p><u>Source</u>: Directly from you or from the business entity you represent  <u>Purpose of collection and use</u>: The purposes listed in <a href="#">Section 2</a> above  <u>Categories of parties to whom personal information is sold</u>: None  <u>Categories of parties to whom personal information is disclosed</u>: Service providers  <u>Retention considerations</u>: The amount of time we will retain your identifiers depends on your relationship with the business you represent.</p>
Internet or other similar network activity	<p><i>Device ID, browsing history, search history, and information regarding your interaction with our website, application, or advertisement</i></p> <p><u>Source</u>: Automatically generated when you use our websites or applications  <u>Purpose of collection and use</u>: All purposes listed in <a href="#">Section 2</a> above  <u>Categories of parties to whom personal information is sold</u>: Advertising networks; data analytics providers  <u>Categories of parties to whom personal information is disclosed</u>: Service providers  <u>Retention Considerations</u>: Internet or other network activity information is typically deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected</p>

*Collection, Use, and Sharing - Individual Consumers*

Most of the information we collect about you is financial information or information collected in the context of our relationship as your money transmitter and is covered by the GLBA. However, in certain circumstances, we may collect information that is outside the context of our financial relationship. This information includes:

Category	Required Information
Identifiers	<p><i>Name, email address, phone number, or other contact address</i></p> <p><u>Source</u>: Directly from you  <u>Purpose of collection and use</u>: The purposes listed in <a href="#">Section 2</a> above  <u>Categories of parties to whom personal information is sold</u>: None  <u>Categories of parties to whom personal information is disclosed</u>: Service providers  <u>Retention considerations</u>: If you become a customer of CXI, we retain your information for the length of time for which you are a customer, and for a period thereafter to comply with our legal obligations and otherwise support our fraud prevention activities. If you do not become a customer, information is typically deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected</p>
Internet or other similar network activity	<p><i>Device ID, browsing history, search history, and information regarding your interaction with our website, application, or advertisement</i></p> <p><u>Source</u>: Automatically generated when you use our websites or applications  <u>Purpose of collection and use</u>: All purposes listed in <a href="#">Section 2</a> above</p>



	<p><u>Categories of parties to whom personal information is sold:</u> Advertising networks; data analytics providers</p> <p><u>Categories of parties to whom personal information is disclosed:</u> Service providers</p> <p><u>Retention Considerations:</u> Internet or other network activity information is typically deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected</p>
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*Collection, Use, and Sharing - Job Applicants*

We collect personal information subject to the CCPA when an individual residing in California applies for employment with CXI. This personal information includes:

Category	Required Information
Identifiers	<p><i>Name, email address, phone number, or other contact address</i></p> <p><u>Source:</u> Directly from you</p> <p><u>Purpose of collection and use:</u> To assess and manage your application; conduct reference checks; assess your suitability for a role for which you have applied; monitor compliance with equal opportunities and non-discrimination policies</p> <p><u>Categories of parties to whom personal information is sold:</u> None</p> <p><u>Categories of parties to whom personal information is disclosed:</u> Service providers</p> <p><u>Retention considerations:</u> If you become an employee of CXI, we retain your information for the length of time for which you are an employee, and for a period thereafter to comply with our legal obligations. If you do not become an employee, information is typically deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected</p>
Education- and Employment-related information	<p><i>Institutions attended, degrees obtained, and courses taken; Current or past job history</i></p> <p><u>Source:</u> Directly from you</p> <p><u>Purpose of collection and use:</u> To assess and manage your application; conduct reference checks; assess your suitability for a role for which you have applied; monitor compliance with equal opportunities and non-discrimination policies</p> <p><u>Categories of parties to whom personal information is sold:</u> None</p> <p><u>Categories of parties to whom personal information is disclosed:</u> Service providers</p> <p><u>Retention considerations:</u> If you become an employee of CXI, we retain your information for the length of time for which you are an employee, and for a period thereafter to comply with our legal obligations. If you do not become an employee, information is typically deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected</p>
Protected Classifications	<p><i>Race, ethnicity, gender, and veteran status</i></p> <p><u>Source:</u> Directly from you</p> <p><u>Purpose of collection and use:</u> To assess and manage your application; conduct reference checks; assess your suitability for a role for which you have applied; monitor compliance with equal opportunities and non-discrimination policies</p> <p><u>Categories of parties to whom personal information is sold:</u> None</p> <p><u>Categories of parties to whom personal information is disclosed:</u> Service providers</p> <p><u>Retention considerations:</u> If you become an employee of CXI, we retain your information for the length of time for which you are an employee, and for a period thereafter to comply with our legal obligations. If you do not become an employee, information is typically deleted at</p>



	regular intervals when the information is no longer necessary for the purposes for which it is collected
Internet or other similar network activity	<p><i>Device ID, browsing history, search history, and information regarding your interaction with our website, application, or advertisement</i></p> <p><u>Source:</u> Automatically generated when you use our websites or applications  <u>Purpose of collection and use:</u> All purposes listed in Section 2 above  <u>Categories of parties to whom personal information is sold:</u> Advertising networks; data analytics providers  <u>Categories of parties to whom personal information is disclosed:</u> Service providers  <u>Retention Considerations:</u> Internet or other network activity information is typically deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected</p>
Audio and visual information	<p><i>Video of you taken by security cameras if you visit a CXI location</i></p> <p><u>Source:</u> Directly from you  <u>Purpose of collection and use:</u> Security; protect our rights and the rights of others  <u>Categories of parties to whom personal information is sold:</u> None  <u>Categories of parties to whom personal information is disclosed:</u> Service providers  <u>Retention considerations:</u> This information is typically deleted at regular intervals when the information is no longer necessary for the purposes for which it is collected</p>

*Rights*

As a California resident, you have the right to request **access** to personal information collected about you and information regarding the source of that personal information, the purposes for which we collect it, and the third parties and service providers with whom we share it. You also have the right to request we **correct inaccurate information**, and to request in certain circumstances that we **delete personal information** that we have collected directly from you. You have the right to be **free from discrimination** based on your exercise of your CCPA rights.

You may submit a request to exercise your rights to access, correct, delete or limit the use of your personal information through one of two means:

- submitting a Contact Us form by selecting "Privacy" for the "Reason for contacting us",
- by calling us at 1-888-998-3948

We may have a reason under the law why we do not have to comply with your request, or why we may comply with it in a more limited way than you anticipated. If we do, we will explain that to you in our response. Upon submission of your request, we will contact you (via the email address provided in your request) with instructions on how to verify the request, after which we will check our records for matching information, and aim to complete requests as soon as reasonably practicable and consistent with any applicable laws. You may authorize another individual or a business registered with the California Secretary of State, called an authorized agent, to make requests on your behalf through these means.

You may **opt out** of the sale of sharing of personal information to third parties by visiting our Your Privacy Choices page. The CCPA also grants you the right to request that we **limit use of sensitive personal information** to certain purposes allowed by law. However, we do not use sensitive personal information in any way for which you would be afforded this right.

**8. Special Information For Individuals in the EU/UK**

*Transfers from the European Economic Area, the United Kingdom and Switzerland*





CXI is an organization established in the United States. For individuals located outside of the United States, your personal information will likely be transferred, stored, and processed in the United States or other countries outside of where you live. Data privacy laws vary from country to country and may not be equivalent to, or as protective as, the laws in your home country. We take steps to ensure reasonable safeguards are in place to ensure an appropriate level of protection of your information and rely on various legal mechanisms to transfer your personal information outside of your location (if applicable).

#### *Legal Bases*

In processing your personal information, we rely on the following legal basis:

- *Performance of a contract:* Where use of your information is necessary to provide you with the Services under a contract or to take steps, at your request, before entering a contract.
- *Legitimate interest:* Where use of your information is necessary for our legitimate interests and where the use is not outweighed by your rights and interests. Our legitimate interests include, but are not limited to, providing the Services, improving the Services, recognizing and better understanding users of the Services, marketing, and promoting the Services.
- *Legal obligation and compliance purposes:* Where use of your information is necessary to comply with laws, regulations, or other legal process, as well as detection, prevention and prosecution of fraud or theft, and preventing illegitimate or prohibited use of our Services or other illegal or wrongful activities.
- *Consent:* We may ask you for consent, when required by applicable law, to process your information in a certain way. Where you are requested to consent to the processing of your personal data, you have the right to withdraw your consent at any time.

#### *Rights*

Individuals in the European Union (EU) and United Kingdom (UK) are entitled to certain rights with respect to the processing of their personal information. If you wish to exercise any of the below rights, please contact us by submitting a Contact Us form by selecting "Privacy" for the "Reason for contacting us", or by calling us at 1-888-998-3948.

- *Right to access:* You have the right to obtain confirmation as to whether we are processing personal information about you, and, if so, request a copy of the personal information. This right has some exceptions, which means you may not always receive all personal information we process.
- *Right to correction:* You have the right to ask us to correct any inaccuracies in the personal information that we hold about you and, where applicable, complete any incomplete information that we hold.
- *Right to erasure:* You have the right, in some circumstances, to require us to delete your personal information. The right to erasure does not apply in certain circumstances, including where processing is necessary for compliance with a legal obligation.
- *Right to restrict processing:* You have the right to ask us to restrict the processing of your personal information in limited circumstances, such as when the information is no longer necessary for purposes of the processing but required for the establishment, exercise, or defense of legal claims.
- *Right to object:* You have the right to object to processing of your personal information, which is carried out on the basis of our legitimate interests, where there are grounds relating to your particular situation.
- *Right to data portability:* You have the right to receive your personal information in a structured, common, and machine-readable format or request transmission of your information to a third-party. This right only applies to personal information you have given us.



- *Right to lodge a complaint:* You have the right to lodge a complaint about our data collection and processing actions with the supervisory authority concerned.

## **9. Children's Privacy**

We do not knowingly collect or solicit personal information from anyone under the age of 13 or knowingly allow such persons to register or use the Services. If we learn that any information we collect has been provided by a child under the age of 13, we will promptly delete that information.

## **10. Contact Us**

If you have questions relating to this Privacy Notice, please contact us by either:

- submitting a Contact Us form by selecting "Privacy" for the "Reason for contacting us",
- by calling us at 1-888-998-3948