

## Privacy Notice

Last Updated: April 16, 2018

TokenEx, LLC takes privacy and data protection issues seriously. Our most important asset is our relationship with our Clients and User community. We are committed to maintaining the confidentiality, integrity and security of information about our Users, Clients, and their organizations.

TokenEx has appointed an internal data protection officer (DPO) for you to contact with questions or concerns about our personal data use or associated practices:

Bob Pezold  
TokenEx, LLC  
PO Box 521068  
Tulsa, OK 74152-1068  
[legal@tokenex.com](mailto:legal@tokenex.com)  
+1 539.424.1028

### 1. Scope of This Privacy Notice

1.1 This Privacy Notice covers TokenEx's treatment of personal information collected from Users of this website (hereinafter "Site"), as well as any information we collect from Clients that use our Services. This personal information primarily consists of information available on a business card such as first and last name, job title, name of employer, email address and phone number.

### 2. Collection and Use of Information

#### 2.1 TokenEx's Site User Information

Whenever an individual enters our Site, they become a "User" of the Site. TokenEx may collect and store certain personal information about your visits and interactions with our site through web beacons, and cookies. Web beacons are small transparent images that collect information about website usage and email response. Cookies are pieces of data stored on your device that perform numerous functions, including:

- Help navigating our website or technical solutions;
- Personalize and provide a more convenient experience to you;
- Analyze which pages you visit;
- Measure advertising and promotional effectiveness;
- Assess which areas of our site you visit to remarket to you after you leave our site;

More information about cookies and how they are used on our site, can be found by clicking the "Cookie Preferences" button found at the bottom of your screen.

TokenEx automatically gathers server log file information, such as your IP address, browser type, referring/exit pages, and operating system. We use this information to administer our website and our technical solutions, to understand how visitors navigate through our Sites and Services and enhance your experience while using our Site.

## 2.2 TokenEx's Contact Submission Forms

If you request information about TokenEx's Services, we will collect your name, email address, phone number, and additional company information. We use this information to contact you about your request, and to follow up with you about our Services in which you expressed an interest. We may share your information with third party vendors to improve our Services, but we will not sell your personal information. For more information about how and when we disclose the information we collect, please see Section 3 "Disclosure of Information" below.

## 2.3 TokenEx's Client Information

Client information is the information we collect from you, as a Client, whenever you contract with us to receive our Services. TokenEx collects information about your business including contact names, billing information, and addresses. This information is stored to allow us to provide you with information about the Services efficiently. This information may be shared with third party vendors in order to improve our business and financial services, but it will not be sold to anyone. For more information about how and when we disclose this information, please see Section 3 "Disclosure of Information" below.

## 2.4 TokenEx's Processing of Client Data

The data TokenEx receives as a result of Client using our Services is treated with the utmost care and security. TokenEx's systems are certified as Level 1 PCI Compliant, all data is fully encrypted, and data security is maintained at a high standard. For more information about how we process data for our Clients, please see the Standard Terms of Service tab on the [Legal page](#) in the Resource Center on this Site. For GDPR considerations, please see the GDPR Compliance tab on the [Legal page](#) in the Resource Center on this Site. Once our Standard Terms of Service are in place, all data processed by TokenEx is held to the standards enumerated in that Agreement.

## 2.5 Use of Client Information

Client information, excluding data provided by Client for Services (such as tokenization, encryption, data vaulting, etc.), may be used for the following reasons:

- to carry out obligations arising under agreements entered between you and TokenEx for Services;
- for research regarding the effectiveness of the Site and related marketing, advertising and sales efforts;
- to respond to your Service related requests and to communicate with you;
- to provide you with information about TokenEx's Services which you utilize or for which you have inquired;
- to contact you regarding Services offered by TokenEx; or,
- to investigate, prevent, or act regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of TokenEx's Standard Terms of Service, or as otherwise required by law.

## 3. Disclosure of Information

### 3.1 Site Users

Information collected from Site Users may be disclosed to third party vendors who have agreed (i) to hold this information in confidence, (ii) not to use it for any purpose except to carry out the service they are providing on behalf of TokenEx, and (iii) only in the ways that are described in this Privacy Statement. TokenEx does not sell your personal information to third parties.

### 3.2 Client Information

Information collected from Clients to process billing may be shared with third party vendors that provide those services. The same standards listed above apply to all third party vendors that have access to Client business information. We do not sell your personal information to third parties.

### 3.3 Client's Data

Client's data provided to TokenEx for processing will not be disclosed for any reason, except as provided for in the [Standard Terms of Service](#). The Services Agreement dictates how data is processed and stored.

### 3.4 Disclosures Required By Law

TokenEx may respond to subpoenas, court orders, or legal processes by disclosing your personal information and other related information, to the extent it is legally required. We will make all reasonable efforts to contact you and inform you of the requested disclosure, if allowed by law.

### 3.5 How You Control Your Information

TokenEx takes information privacy seriously and we strive to keep all the information we collect safe; however, if you do not feel comfortable with your data being collected you have options. You may control what cookies and web beacons are used when visiting our Site by clicking the "Cookie Preferences" button found at the bottom of your screen.

You can also choose what information you provide to us in any of our submission forms. That information is used to contact you and answer any questions you have, although you do not have to fill out any forms or provide any information you feel uncomfortable about. Additionally, if you have any questions about how your data is shared, you may contact [legal@tokenex.com](mailto:legal@tokenex.com).

## 4. Right to Amend and Erase

### 4.1 Site and Contact Information

Information that is collected from the Site automatically, contact and inquiry forms, as well as the information collected in order to contract with a Client (such as contact and billing information) may be amended or deleted upon request. If at any time you would like your data corrected because of any error, or deleted, you may make that request to [legal@tokenex.com](mailto:legal@tokenex.com). TokenEx will strive to answer all requests within 30 days, and comply to the best of our ability.

### 4.2 Client Data

All Client Data that TokenEx processes is subject to the Standard Terms of Service signed by both parties. The options enumerated above are superseded by the terms in the Standard Terms of Service.

## 5. General

### 5.1 Privacy Shield

TokenEx participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework and the Swiss-U.S. Privacy Shield Framework. We are committed to subjecting all personal information received from European Union (EU) member countries and Switzerland to the Framework's applicable Principles. TokenEx is subject to the regulatory enforcement powers of the U.S. Federal Trade Commission. To learn more about the Privacy Shield Frameworks, and to view our certification, visit the U.S. Department of Commerce's Privacy Shield List. [<https://www.privacyshield.gov>]

### 5.2 Complaints

In compliance with the Privacy Shield Principles, TokenEx commits to resolve complaints about our collection or use of your personal information. European Union and/or Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact TokenEx at [legal@tokenex.com](mailto:legal@tokenex.com) or by mail at TokenEx, P.O. Box 521068, Tulsa, Oklahoma 74152-1068, Attn: Legal Department.

TokenEx has further committed to refer unresolved Privacy Shield complaints to the American Arbitration Association, an alternative dispute resolution provider. If you do not receive timely acknowledgment of your complaint from us, or if we have not resolved your complaint, please contact or visit the American Arbitration Association at [www.adr.org](http://www.adr.org) or by phone at 800.778.7879, for more information or to file a complaint. The services of the American Arbitration Association are provided at no cost to you.

An individual may, under certain conditions, invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms. For additional information see: <https://www.privacyshield.gov/article?id=ANNEX-I-introduction>.

## 6. Changes to this Privacy Notice

TokenEx reserves the right to modify or amend this Privacy Notice at any time and for any reason. Please note the date at the top of this document to determine the latest revision date of this Privacy Notice. Any changes to this Privacy Notice will become effective immediately when posted on the Site.

If you have additional questions about this Privacy Notice, please contact TokenEx by email at [legal@tokenex.com](mailto:legal@tokenex.com) or by mail at TokenEx, P.O. Box 521068, Tulsa, Oklahoma 74152-1068, Attn: Legal Department.