

PAYDESIGN

PRIVACY POLICY

Last modified: July 19, 2022

1. **Introduction**

PayDesign, Inc. (“**PayDesign**”) respects your privacy and is committed to protecting it through PayDesign’s compliance with this Privacy Policy (the “**Policy**” or “**Privacy Policy**”).

This Policy describes the types of information PayDesign may collect from you or that you may provide when you visit or use, whether as a guest or a registered user, <https://bonusright.com/>, <https://bonusrightapp.com/>, <https://mybonusright.com/>, and any other PayDesign website or client portal (collectively, the “**Websites**”), any PayDesign mobile or desktop apps (the “**Apps**”), and any content, functionality, technology solutions and services offered on or through the Websites or Apps (collectively, the “**Services**”), and PayDesign’s practices for collecting, using, maintaining, protecting, and disclosing that information. The Website, Apps and Services are collectively referred to as the “**BonusRight Platform.**”

This Policy applies to information PayDesign collects:

- On the BonusRight Platform.
- In email, text, and other electronic messages between you, PayDesign, and/or the BonusRight Platform.
- When you interact with PayDesign’s advertising and applications on third-party websites and services if those applications or advertising include links to this Policy.
- Through the provision of PayDesign Services.
- From partners of PayDesign that you provided data to.

It does not apply to information collected by:

- Any third party that gets access to the information, including through any application or content (including advertising) that may link to or be accessible from, on or through the BonusRight Platform or any information you provide to or is collected by any third party.

Please read this Policy carefully to understand PayDesign’s policies and practices regarding your information and how PayDesign will treat it. If you do not agree with this Policy, your choice is not to use the BonusRight Platform or PayDesign’s Services. By accessing or using this BonusRight Platform or PayDesign Services, you agree to this Privacy Policy. This Policy may change from time to time (see [Changes to PayDesign’s Privacy Policy](#) below). Your continued use of the BonusRight Platform and Services after PayDesign makes changes is deemed to be acceptance of those changes, so please check the Policy periodically for updates.

2. **Information PayDesign Collects About You and How PayDesign Collects It**

PayDesign collects several types of information from and about users of the BonusRight Platform:

- Directly from you when you provide it to us.
- Automatically when you visit or use any portions of the BonusRight Platform.

Information You Provide to Us

When you register with or use the BonusRight Platform, PayDesign may ask that you provide information:

- By which you may be personally identified, such as name, postal address, e-mail address, telephone number, employer, job title or position, compensation information, online profile (such as LinkedIn, Facebook, etc.), or other identifier by which you may be contacted online or offline (“personal information”).
- That is about you but individually does not identify you.

The information PayDesign collects on or through the BonusRight Platform may include:

- Information that you provide by filling in forms in the BonusRight Platform. This includes information provided at the time of registering to use the BonusRight Platform, subscribing to our Service, posting material, and requesting further services. We may also ask you for information when you enter a contest or promotion sponsored by us, and when you report a problem with the BonusRight Platform.
- Records and copies of your correspondence (including email addresses and phone numbers) if you contact us.
- Your responses to surveys that we might ask you to complete for research purposes.
- Details of transactions you carry out through the BonusRight Platform
- Your search queries on the BonusRight Platform.

You also may provide information to be published or displayed (hereinafter, “**posted**”) on public areas of the BonusRight Platform or transmitted to other users of the BonusRight Platform or third parties (collectively, “**User Contributions**”). Your User Contributions are posted on and transmitted to others at your own risk. Please be aware that no security measures are perfect or impenetrable. Additionally, PayDesign cannot control the actions of other users of the BonusRight Platform with whom you may choose to share your User Contributions. Therefore, PayDesign cannot and does not guarantee that your User Contributions will not be viewed by unauthorized persons.

Information PayDesign Collects Through Automatic Data Collection Technologies

When you access, use, navigate through and interact with portions of the BonusRight Platform, PayDesign may use technology to automatically collect:

- **Usage Details.** When you access and use the BonusRight Platform, PayDesign may automatically collect certain details of your access to and use of the BonusRight Platform, including location data, logs, and other communication data and the resources that you access and use on or through the BonusRight Platform.
- **Device Information.** PayDesign may collect information about your mobile device, computer and internet connection, including the device’s unique device identifier, IP address, operating system, browser type, mobile network information, and the device’s telephone number.

If you do not want us to collect this information do not visit or use the BonusRight Platform.

The technologies PayDesign uses for this automatic data collection may include:

- **Cookies (or mobile/browser cookies).** A cookie is a small file placed on the hard drive of your computer or other device. You may be able to refuse to accept mobile or browser cookies by activating the appropriate setting on your device or browser. However, if you select this setting, you may be unable to access certain parts of the BonusRight Platform. Unless you have adjusted your browser setting so that it will refuse cookies, PayDesign’s system will issue cookies when you direct your browser to the BonusRight Platform.
- **Web Beacons.** Pages of the BonusRight Platform and PayDesign’s e-mails may contain small electronic files known as web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) that

permit PayDesign, for example, to count users who have visited those pages or opened an email and for other related app or platform statistics (for example, recording the popularity of certain content and verifying system and server integrity).

- **Local Storage Objects.** PayDesign may elect to use Local Storage Objects (LSOs) such as HTML5 to store blog user preferences and information such as email address.

PayDesign does not collect personal information automatically, but PayDesign may tie this information to personal information about you that PayDesign collects from other sources or that you provide to us.

3. Third-Party Use of Cookies and Other Tracking Technologies

When you use the BonusRight Platform, or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks, and ad servers.
- Analytics companies.
- Your mobile device manufacturer.
- Your mobile service provider.

For example, PayDesign may implement and use display advertising across third party websites and applications opted into the Google Content Network. Certain PayDesign advertisements on third party websites and applications in the Google Content Network may be retargeted using Google Analytics. Retargeting means that third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimize, and serve ads based on past visits to our website.

PayDesign may also partner with other third parties to either display advertising on the BonusRight Platform or to manage our advertising on other websites. Our third-party partner may use technologies such as cookies to gather information about your activities on the BonusRight Platform in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for interest-based ads, you may opt-out by sending an email to bonusrightsupport@vladvisors.com. Please note this does not opt you out of being served ads. You will continue to receive generic ads.

These third parties may use tracking technologies to collect information about you when you use the BonusRight Platform. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different platforms, apps, and other online services platforms. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

PayDesign does not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly. For information about how you can opt out of receiving targeted advertising from many providers, see [Choices about How PayDesign Uses and Discloses Your Information](#) below.

4. How PayDesign Uses Your Information

PayDesign uses information that PayDesign collects about you or that you provide to PayDesign, including any personal information:

- To provide you with the BonusRight Platform, and its contents, and any other information, products or services that you request from PayDesign.
- For analytics purposes related to compensation programs and trends.
- To fulfill any other purpose for which you provide it.

- To carry out PayDesign’s obligations and enforce PayDesign’s rights arising from any contracts entered into between you and PayDesign, including for billing and collection.
- To notify you about changes to the BonusRight Platform or any products or services PayDesign offers or provides through it.
- To allow you to participate in interactive features on the BonusRight Platform.
- To understand and set your communication preferences.
- In any other way PayDesign may describe when you provide the information.
- For any other purpose with your consent.

The information PayDesign collects helps PayDesign to improve the BonusRight Platform and to deliver a better and more personalized service, including by enabling PayDesign to:

- Estimate PayDesign’s audience size and usage patterns.
- Store information about your preferences, allowing us to customize the BonusRight Platform according to your individual interests.
- Speed up your searches.
- Recognize you when you return to the BonusRight Platform.

PayDesign may also use your information to contact you about PayDesign’s own and third-parties’ goods and services that may be of interest to you. If you do not want us to use your information in this way, please send an email to PayDesign at bonusrightsupport@vladvisors.com. For more information, see [Choices about How PayDesign Uses and Discloses Your Information](#) below.

PayDesign may use the information it has collected from you to enable PayDesign to display advertisements to PayDesign’s advertisers’ target audiences. Even though PayDesign does not disclose your personal information for these purposes without your consent, if you click on or otherwise interact with an advertisement, the advertiser may assume that you meet its target criteria.

5. Disclosure of Your Information

PayDesign may disclose aggregated information about PayDesign’s users, including BonusRight Platform users, and information that does not identify any individual, without restriction, including disclosure of aggregated compensation data and trends.

PayDesign may disclose personal information that PayDesign collects, or you provide, as described in this Privacy Policy:

- To PayDesign’s subsidiaries and affiliates.
- To PayDesign’s customers.
- To contractors, service providers, and other third parties PayDesign uses to support PayDesign’s business.
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of PayDesign’s assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by PayDesign about BonusRight Platform users is among the assets transferred.
- To third parties to market their products or services to you if you have not opted out of these disclosures. For more information, see [Choices about How PayDesign Uses and Discloses Your Information](#) below.

- For any other purpose disclosed by us when you provide the information.
- With your consent.
- To comply with any court order, law, or legal process, including to respond to any government or regulatory request.
- To enforce or apply the BonusRight Platform Terms of Use at <https://bonusrightapp.com/site/terms-of-use.pdf> and other agreements, including for billing and collection purposes.
- If PayDesign believes disclosure is necessary or appropriate to protect the rights, property, or safety of PayDesign, PayDesign's customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.

6. Choices about How PayDesign Uses and Discloses Your Information

PayDesign strives to provide you with choices regarding the personal information you provide to us. This section describes mechanisms PayDesign provides for you to control certain uses and disclosures of your information:

- **Tracking Technologies and Advertising.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, or block use of other tracking technologies, some parts of the BonusRight Platform may then be inaccessible or not function properly.
- **Location Information.** You can choose whether or not to allow the BonusRight Platform to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some parts of the BonusRight Platform may become inaccessible or not function properly.
- **Promotion by the Company.** If you do not want us to use your email address or other contact information to promote PayDesign's own or third parties' products or services, you can opt-out by sending an email stating your request to bonusrightsupport@vladvisors.com.
- **Targeted Advertising by the Company.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by sending us an email stating your request to bonusrightsupport@vladvisors.com.
- **Google Analytics for Display Network.** If you would like to be removed or blocked from Google Analytics for Display Network or from retargeting efforts there are several options:
 - You can customize ad settings by using the Ads Preferences Manager;
 - You can apply the Google Analytics opt-out browser add on located at <https://tools.google.com/dlpage/gaoptout/>.

PayDesign does not control third parties' collection or use of your information to serve interest-based advertising. However, these third parties may provide you with ways to choose not to have your information collected or used in this way. You can opt out of receiving targeted ads or cookies from members of the Network Advertising Initiative ("NAI") on the NAI's opt out page <http://www.networkadvertising.org/choices/> or the Digital Advertising Alliance website (<http://www.aboutads.info/choices/>), or if you are in the EU, the EDAA (<http://www.youronlinechoices.eu/>).

California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) below for more information.

7. Accessing and Correcting Your Information

You can review and change your personal information by logging into the BonusRight Platform and visiting your account profile page, if applicable.

You may also send us an email at bonusrightsupport@vladvisors.com to request access to, correct or delete any personal information that you have provided to us. PayDesign cannot delete your personal information except by also deleting your user account. PayDesign may not accommodate a request to change information if PayDesign believes that the change would violate any law or legal requirement or cause the information to be incorrect.

If you delete your User Contributions from the BonusRight Platform, copies of your User Contributions may remain viewable in cached and archived pages or might have been copied or stored by other BonusRight Platform users. Proper access and use of information provided on the BonusRight Platform, including User Contributions, is governed by the BonusRight Platform Terms of Use located at <https://bonusrightapp.com/site/terms-of-use.pdf>.

California residents may have additional personal information rights and choices. Please see [Your California Privacy Rights](#) below for more information.

8. Your California Privacy Rights

If you are a California resident, California law may provide you with additional rights regarding PayDesign's use of your personal information.

California's "Shine the Light" law (Civil Code Section § 1798.83) may permit users of the BonusRight Platform that are California residents to request certain information regarding PayDesign's disclosure of personal information to third parties for their direct marketing purposes. To make such a request, please send an email to bonusrightsupport@vladvisors.com.

9. Rights of Residents in the European Union (EU)

If you use the BonusRight Platform and reside in the EU, you are entitled by law to access, correct, amend, or delete personal information about you that we hold. A list of these rights is below. Please note that these rights are not absolute and certain exemptions apply. To exercise these rights please contact us at support. For your protection, we may need to verify your identity before responding to your request, such as verifying that the email address from which you send the request matches your email address that we have on file. In the event that we refuse a request under rights of access, we will provide you a reason as to why.

- ***The right to access:*** You have the right to ask us for copies of your personal information. This right has some exemptions, which means you may not always receive all the information we process. When making a request, please provide an accurate description of the data you want access to.
- ***The right to rectification:*** You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- ***The right to erasure:*** You have the right to ask us to erase your personal information in certain circumstances, including (i) when your personal information is no longer necessary for the purposes for which it was collected or processed or (ii) your information must be erased to comply with a legal obligation in EU Union or Member State law.
- ***The right to restrict processing:*** You have the right to ask us to restrict the processing of your information in certain circumstances, including (i) when the accuracy of the information is brought into question or (ii) when we no longer need the information for purposes of the processing but you require such information for the establishment, exercise, or defense of a legal claim. See "choices about your information" for some ways you can restrict processing.

- ***The right to object to processing:*** You have the right to object to processing if we are able to process your information because the process is in our legitimate interests. See “choices about your information” for some ways you can object to processing.
- ***The right to data portability:*** This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organization to another, or give it to you.
- ***The right to lodge a complaint with the supervisory authority.*** A list of Supervisory Authorities is available here: http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

10. How Long Do We Keep Your Information

Subject to any applicable laws that that require shorter periods, PayDesign will retain your personal information until the later of (i) the information is no longer necessary to accomplish the purpose for which it was provided; or (ii) for information related to a compensation plan or program sponsor, the applicable compensation plan or program, and the participants in such compensation plan or program, seven (7) years after PayDesign’s relationship with the compensation plan or program sponsor ends.

We may retain your information for longer periods for specific purposes to the extent that we are obliged to do so in accordance with applicable laws and regulations and/or as necessary to protect our legal rights or for certain business requirements. For example, when we process your payments, we may retain this data for longer periods of time as required for tax or accounting purposes. More specifically, we would retain some data for longer periods of time for the following reasons:

- ***Security, fraud, and abuse prevention:*** To protect you, other people, and us from fraud, abuse, and unauthorized access.
- ***Financial recordkeeping:*** When you make a payment to us, we are often required to retain this information for long period of time for purposes of accounting, dispute resolution, and compliance with tax, anti-money laundering, and other financial regulations.
- ***Complying with legal or regulatory requirements:*** To meet any applicable law, regulation, legal process, or enforceable governmental request, as required to enforce our terms of service, including investigation of potential violations.
- ***Direct communications with us:*** If you have directly communicated with us, through a support channel, feedback form, or a bug report, we may retain reasonable records of those communications.

For any privacy or data-protection-related questions, please write to bonusrightsupport@vladvisors.com.

11. Data Security

PayDesign has implemented measures designed to secure your personal information from accidental loss and from unauthorized access, use, alteration, and disclosure.

The safety and security of your information also depends on you. Where PayDesign has given you (or where you have chosen) a password for access to certain parts of the BonusRight Platform, you are responsible for keeping this password confidential. PayDesign asks that you not share your password with anyone. PayDesign urges you to be careful about giving out information in public areas of the BonusRight Platform or the sharing of information with third parties.

Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although PayDesign takes reasonable steps to protect your personal information, PayDesign cannot guarantee the security of your personal information transmitted to or through the BonusRight Platform.

Any transmission of personal information is at your own risk. PayDesign is not responsible for circumvention of any privacy settings or security measures contained on the BonusRight Platform.

12. Changes to PayDesign's Privacy Policy

PayDesign may update the Privacy Policy from time to time. If PayDesign makes material changes to how it treats its users' personal information, PayDesign will post the new Privacy Policy on this page with a notice that the privacy policy has been updated.

The date the Privacy Policy was last revised is identified at the top of the page.

13. Contact Information

To ask questions or comment about this Privacy Policy and PayDesign's privacy practices, contact us at: bonusrightsupport@vladvisors.com

Visit <https://bonusright.com/> for the most up-to-date contact information.