

## Privacy Statement

Xpensable, Inc. ("Xpensable") is the developer of web and application based expense management software products. With all of our products and services, we adhere to the following Privacy Policy. Xpensable realizes how important the privacy and security of personal information is to our users and financial institution partners. Our privacy policies apply to all of our uses automatically. We work very hard to maintain the confidentiality of all data that is submitted to us.

## Information we collect

In order to provide our services, Xpensable collects various types of information, including limited personal information, about our users. When you sign up for an Xpensable account, you will be asked to provide basic registration information, such as name, user name, password, email address and mobile phone number.

## Cookies

Xpensable sometimes uses cookies to enhance our service. A cookie is a small data file containing a string of characters, which is transferred by a website to your computer's hard drive. Cookies are used for a variety of reasons including security and to personalize our website for you. Our cookies never identify you by your name or account number.

## Online Advertising & Remarketing

In order to reach people, like you who have previously visited our website and shown interest in our services, Xpensable uses Google's AdWords "remarketing" service. This service allows our ads to be shown to you as you travel across the internet, by placing a cookie on your web browser. All it does is, it says, this person visited this page, so show them ads relating to that page. As always we respect your privacy, so please note that this cookie does not in any way identify you or give access to your computer. Using a cookie for remarketing purposes only allows us to tailor our marketing programs to better suit your needs by only displaying ads that are relevant to you. However, you are free to opt of Google's use of cookies by visiting Google's Ads Settings web page.

## Log Information

While using the Xpensable website or an Xpensable service, our servers automatically record information that your browser sends. These logs may include information such as login and logout times, your web request, IP address, browser type, browser language, the date and time of your request and one or more cookies that may uniquely identify you.

## Communications

When you communicate with other users or our staff through the Xpensable website or via an Xpensable service, those communications are saved in order to process your inquiries, respond to your requests and improve our services.

## Business Partners

Business Partners: We offer some of our services in connection with business partners. In some cases, information you provide under your Xpensable account may be shared with our business partners to provide services requested by you. We process your information in accordance with this Privacy Policy.

Although we choose our business partners carefully, Xpensable cannot be responsible for the privacy practices of websites operated by third parties that are linked to or from our website. Once you have left our website, you should be sure to check the applicable privacy statement of the third party website to determine how they will use information they collect from you.

## Protecting Your Data

Every precaution is taken to insure the security of your data while using the Xpensable website or a Xpensable service. We use industry-standard firewalls, secure web servers (https), data encryption and authentication procedures, among other techniques, to maintain the security of your data and your online session.

## **Using the Information**

Xpensable uses personal information only for the purposes for which it was collected and in accordance with this Privacy Policy. We take reasonable steps to ensure that the personal information we process is accurate, complete, and current, but we depend on our users to update or correct their personal information whenever necessary.

We may use the information you provide about yourself to fulfill your requests for our products, programs, and services, to respond to your inquiries about our services, and to offer you other products, programs or services that we believe may be of interest to you.

We may use your personal information to create anonymous data records or aggregations of data, to perform statistical analyses and for other purposes, by removing information that makes the data personally identifiable to you.

We may use or disclose your information to respond to subpoenas, court orders, or legal process, or to establish or exercise our legal rights or defend against legal claims.

We may transfer your information to a third party in connection with a sale or acquisition of Xpensable or all or substantially all of its assets, or in connection with a merger or corporate reorganization.

## **Data Ownership**

Any data you submit while using the Xpensable website or a Xpensable service belongs to you. You can remove it at any time. If you ask us to delete your account, we will make commercially reasonable efforts to remove all of your data from our servers. Despite such removal efforts, portions of your data may remain on our production and back-up servers indefinitely.

Any information you submit that can identify you personally on a blog, bulletin board or chat room through the Xpensable website or a Xpensable service can be viewed and used by other Xpensable users, and could be used to send you unsolicited messages. Xpensable is not responsible for your disclosure of this information in these forums.

## **Policy Changes**

We reserve the right at our discretion to make changes to this Privacy Policy at any time.