

Xcaliber Solutions Inc. takes privacy and data protection issues seriously. We have designed this Privacy Policy to explain how we handle personally identifiable information collected from Clients who register for services and submit information to Xcaliber Solutions Inc. through the Internet.

As the Xcaliber Solutions Inc. services evolve, we may revise this policy, so please check back frequently. If you have questions about Xcaliber Solutions Inc. privacy practices please contact us at [privacy@xcaliber-solutions.com](mailto:privacy@xcaliber-solutions.com)

### **Scope Privacy Policy Basics**

This Privacy Policy covers Xcaliber Solutions Inc.'s treatment of personally identifiable information collected from clients (hereafter "Client" or "you") who use the Xcaliber Solutions Inc. payment gateway services, as well as consumer information that we acquire in the course of our business. This Policy also covers the treatment of personally identifiable information that Xcaliber Solutions Inc.'s business partners may share with it.

This Policy does not apply to the practices of companies that Xcaliber Solutions Inc. does not own or control, or to people that Xcaliber Solutions Inc. does not employ or manage.

### **Information Collected and It's Use**

Xcaliber Solutions Inc. collects personally identifiable information when you register for an Xcaliber Solutions Inc. account, and when you use certain Xcaliber Solutions Inc. products and services. Xcaliber Solutions Inc. may also receive personally identifiable information from its resellers and other business partners.

When you register with Xcaliber Solutions Inc., we ask for your contact information (such as your name, street address and email address), as well as certain information pertaining to your business, along with billing information such as a bank account and/or credit card number.

In the course of providing services we typically receive from vendors or a financial institution information related to the client. This normally includes information about the payment that a consumer has furnished the Client or financial institution in placing the order. We do not acquire any information directly from consumers through the [www.xcaliber-solutions.com](http://www.xcaliber-solutions.com) Web site.

The personally identifiable information we acquire in processing services varies according to the nature of the transaction and the way in which client is using our services. It may include, for example, the amount of the transaction, the consumer's name, credit card number and expiration date, checking account number, billing address, and passwords.

Xcaliber Solutions Inc. uses the information collected to fulfill your requests for certain products and services, to provide services, to facilitate billing, and otherwise deliver requested services. We may also send client announcements, newsletters, and periodic notices about specials, new products and services and products and services offered by Xcaliber Solutions Inc. business partners. Personally identifiable consumer information is used to process payment transactions and for no other purpose.

Xcaliber Solutions Inc. does not offer services or sell products to children. Xcaliber Solutions Inc. does not request or knowingly collect personally identifiable contact information from anyone under the age of 18.

## Information Sharing and Disclosure

Protecting personally identifiable information about Clients and consumers is an important part of our business. We share and disclose such information only as described below.

Xcaliber Solutions Inc. sends personally identifiable information about you to other companies or people: 1) when we have your consent to share the information; 2) when we need to share your information with third parties, such as banks and credit card processors, to provide the product or service you have requested; 3) in connection with products and services offered by Xcaliber Solutions Inc. business partners and/or companies who work on behalf of Xcaliber Solutions Inc. to provide a product or service to you; 4) to comply with federal, state and local laws, including credit reporting laws and card association rules; 5) it is necessary to enforce or apply the terms and conditions of our Client Agreement and other applicable agreements; or 6) it is necessary to protect the rights, property, or safety of Xcaliber Solutions Inc., our users, or others, which may include the exchange of information with other organizations for fraud protection and/or risk reduction.

In the event that Xcaliber Solutions Inc. is acquired, Client account information may be one of the transferred assets.

## Information Security

Information security is critical to our business. We work to protect the security of your information during transmission by using Secure Sockets Layer (SSL) software, which encrypts information you input. We store information gathered on secure computers located in a locked data center. The number of employees involved in the management of the data center that have physical access to these computers is limited. We use firewalls and other security technology to prevent our computers from being accessed by unauthorized persons.

We also require that any personally identifiable consumer information sent to us by you be encrypted using SSL encryption.

It is important for you to protect against unauthorized access to your Login ID/password and to your computer. Be sure to sign off when finished using a computer, whether or not it is shared, and otherwise protect and periodically change the password used to access the Xcaliber Solutions Inc. services.

## Changes to this Privacy Policy

Xcaliber Solutions Inc. reserves the right to modify or amend this Privacy Policy at any time and for any reason. If there are material changes to this statement or in how Xcaliber Solutions Inc. will use personally identifiable information, Xcaliber Solutions Inc. will post notice on the Xcaliber Solutions Inc. homepage at [www.xcaliber-solutions.com](http://www.xcaliber-solutions.com) prior to implementing the change. The amended Terms shall automatically become effective immediately after they are posted. Your continued use of the site or Xcaliber Solutions Inc. services after the posting of the amended Terms on the Site constitutes your affirmative: (a) acknowledgement of the terms and its modifications; and (b) agreement to abide and be bound by the terms, as amended. If you have additional questions about this Policy, please contact us at [privacy@xcaliber-solutions.com](mailto:privacy@xcaliber-solutions.com)