

GLBA Statement

(Supplements a larger United States Privacy Policy)

Facts: What does the Corpay Cross-Border business do with your personal information?

In the **Corpay^** cross-border business, the USA privacy policy is comprised of two documents which are to be read together:

- 1. The main policy document at https://www.fleetcor.com/privacy-policy.
- This GLBA Statement: a supplementary document focused primarily on consumer financial privacy protections offered by the US federal statute GLBA (The Gramm-Leach-Bliley Act).

Why?

Financial companies (we are a financial company: specifically, a non-depository financial institution) choose how they share your personal information. Federal law gives consumers the right to limit some but not all sharing. Federal law also requires us to tell you how we collect, share, and protect your personal information. Please read this notice carefully to understand what we do.

What?

The types of personal information we collect and share depend on the product or service you have with us. This information can include, without limitation:

- government identification numbers, such as: driver's license, state identification,
 passport, immigration-visa, or Social Security number
- name, address, email address, mobile and home telephone number
- account balances and transaction history



- credit and payment history,
- computer and mobile device information such as the domain and host you use to access the Internet; your computer's IP address; mobile device geolocation, number and other information from and about your device (such as device properties, settings, applications, stored information and usage) and carrier; the browser and operating system software you use; social profile and network information; the date and time you access our website and the Internet address used to link to our website when you visit us,
- data cookies: see https://www.cookiesandyou.com/ to learn what cookies are and how to disable them.

You consent to our collection, transfer, and storage of your personal information by computers or other transfer or storage devices in the United States and elsewhere.

When?

This GLBA Statement was last modified on December 29, 2021.

How?

We – just like all other financial companies – need to share customers' and consumers' personal information to run our everyday business. In the section below, we list the reasons financial companies generally can share their customers' and consumers' personal information; the reasons Cambridge Mercantile Corp. (U.S.A.) and Associated Foreign Exchange, Inc. (both subsidiaries of NYSE: FLT (Fleetcor); both are also part of Fleetcor's Corpay^ brand) chooses to share; and whether you can limit this sharing.



Reasons we can share your personal information	Does Corpay Cross- Border share?	Can you limit this sharing?
For our everyday business purposes such as to process your transactions; maintain your account(s); respond to court orders and legal investigations; report to credit bureaus; gather information about website access, usage, and performance; enhance your consumer experience; validate your creditworthiness or your identity; or as otherwise permitted or required by law	Yes	No
For our marketing purposes such as us offering to you our products and services to you or notify you about future events and promotions	Yes	No
For joint marketing with other financial companies (i.e., ones that are not our affiliates)	No	We don't share
For our affiliates' everyday business purposes — such as information about your transactions and experiences	Yes	No
For our affiliates' everyday business purposes — such as information about your creditworthiness	Yes	Yes
For our affiliates to market to you	Yes	Yes
For nonaffiliates to market to you	No	We don't share



To limit our sharing

OPT-OUT RIGHT (EXCEPT FOR VERMONT AND CALIFORNIA CONSUMERS)

If you prefer that we limit sharing with affiliates or nonaffiliated third parties as described above, you may opt-out of those disclosures as follows:

E-mail: privacy@fleetcor.com

Mail to:

Corpay Cross-Border Privacy Officer 212 King Street West, Suite 400 Toronto, ON M5H 1K5

VERMONT AND CALIFORNIA CONSUMERS:

Corpay cross-border will disclose information about consumers with a Vermont or California mailing address only with your written authorization ("consent"), unless otherwise permitted or required by law. Written authorizations from Vermont consumers may be delivered to us at the address above or by email at privacy@fleetcor.com and must contain your name, address, signature, and your consent. You may revoke your consent at any time by writing or emailing us at the addresses provided above. California consumers should contact us at the addresses above for instructions on how to deliver their consent.

Note: Disclosures not subject to an opt-out choice include disclosures necessary to effect, administer or enforce a transaction you request; disclosures to our authorized service providers; disclosures permitted or required by law or disclosures to prevent fraud or other illegal activities.

Please note: If you are a new consumer or customer, we can begin sharing your information 30 days from the date we provided this notice. When you are no longer our consumer or customer, we continue to share your information as described in this notice. However, you can contact us at any time to limit our sharing.

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Questions?

Send an email to privacy@fleetcor.com.

Who is providing this notice?

Associated Foreign Exchange, Inc. and Cambridge Mercantile Corp. (U.S.A.), which individually and collectively used the **Corpay** brand-name (Corpay is a Fleetcor (NYSE: FLT) brand). US customers of our legally affiliated Corpay cross-border companies are also covered by both this GLBA statement and by https://www.fleetcor.com/privacy-policy/.

What we do

How does Corpay cross-border protect my personal information?

To help protect your personal information from unauthorized access, use and disclosure, we use reasonable security measures. These measures include physical, electronic, and procedural safeguards such as computer safeguards and secured files and buildings. We also take measures to limit personal information access to only employees, agents and representatives that need to know. Despite our efforts, third parties may unlawfully intercept or access your transmissions to us or may wrongly instruct you to disclose information to them by posing as Corpay cross-border or by misinforming you about our services. Always use caution and good judgment when using Internet or mobile phone technologies.

How does Corpay cross-border collect my personal information?

We collect your personal information, for example, when you:

- send or receive money, complete a payment, or use or request other products or services
 from us
- submit information to us on applications or other forms and by other means
- use our or other online sites (for example, to complete a transaction, manage your accounts, or provide your choices)
- enter a promotion

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Why can't I limit all sharing?

Federal law gives you the right to limit only:

- sharing for affiliates' everyday business purposes—information about your creditworthiness
- affiliates from using your information to market to you
- sharing for nonaffiliates to market to you

State laws and individual companies may give you additional rights to limit sharing. For details, see the "To limit our sharing" section.

What happens when I limit sharing for an account that I hold jointly with someone else?

Your choices will apply to everyone on your account.

Definitions

Affiliates

Companies related by common ownership or control. They can be financial and nonfinancial companies. Since we are a subsidiary of the publicly traded Fleetcor company (NYSE: FLT), that publicly traded company and all its other subsidiaries are our affiliates.

Nonaffiliates

Companies not related by common ownership or control. They can be financial and nonfinancial companies.

For example, we may disclose information about current and former consumers and customers to third parties, including without limitation (but not for any nonaffiliates to market to you, unless you separately and explicitly consent to same): financial service providers that we contract with in order

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to offer our services; banks, brokerage houses, and other financial companies; nonfinancial entities such as government agencies, and otherwise as permitted or required by law.

Joint marketing

A formal agreement between nonaffiliated financial companies that together market financial products or services to you.

Other important information

As noted above, please be sure to also read our main US Privacy Policy here: https://www.fleetcor.com/privacy-policy/.

CALIFORNIA CONSUMERS

Effective January 1, 2020, the California Consumer Privacy Act ("CCPA") permits consumers who are California residents to

- (a) ask a covered business which categories or pieces of personal information it collects and how the information is used;
- (b) request deletion of the information, and
- (c) opt out of the sale of such information, if applicable.

The CCPA sets forth certain exceptions to these general provisions, including for personal information collected, processed, sold, or disclosed by financial institutions pursuant to specified federal law, for personal information provided in the context of certain business to business transactions, and when we are required to retain information to comply with other laws. To contact us with questions about our compliance with the CCPA, email us at privacy@fleetcor.com. Please note, consumers will not receive discriminatory treatment for the exercise of privacy rights conferred by the CCPA.



TEXAS CONSUMERS

If you have a complaint, first email privacy@fleetcor.com. If you still have an unresolved complaint regarding the company's money transmission or currency exchange activity, please direct your complaint to: Texas Department of Banking, 2601 North Lamar Boulevard, Austin, Texas, 78705, 1-877-276-5554 (toll free) www.dob.texas.gov.

ONLINE ACTIVITIES

Please see above the last two bullets of the What section on the first page of this notice.

CHILDREN'S PRIVACY

Our website is not directed at children under the age of 13. Corpay cross-border does not knowingly collect or maintain information at our website from persons under the age of 13.

EXTERNAL WEBSITES

Our website may be linked to or from third party websites. Corpay cross-border is not responsible for the content or privacy practices of websites that are linked to or from our website.

CHANGES

Corpay cross-border reserves the right to modify this GLBA Statement. You can get updated Privacy Statements by emailing privacy@fleetcor.com or by visiting our website at www.corpay.com.

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