Corpay Cross-Border Privacy Policy: Europe

ABOUT THIS PRIVACY POLICY

This Privacy Notice covers all of your personal information that we collect and use. In this Privacy Notice, "personal data" or "personal information" means information that (either in isolation or in combination with other information held by us) enables you to be identified as an individual or recognised as an individual directly or indirectly. This policy applies to data protected by GDPR – including, for example, personal data relating to living individuals residing in the EEA, and personal data processed by our EU entities.

For the purposes of data protection laws, the data controller is one or more of these affiliated entities that you interact with/who processes your personal data (both are subsidiaries of NYSE: CPAY):

1. Associated Foreign Exchange (Ireland) Limited [a limited liability company incorporated in Ireland];

2. AFEX Markets Europe Limited [a limited liability company incorporated in Ireland];

3. Alpha FX Europe Limited [a limited liability company incorporated in Malta].

Where we act as a data processor on behalf of another controller, we will ensure that a written data processing agreement is in place that complies with Article 28 of the GDPR.

Our websites may contain links (which may take the form of hyperlinks, widgets, clickable logos, plug-ins, images or banners) to websites and services operated by entities other than us. This Privacy Notice does not apply to such other websites or services, and we recommend that you review their posted privacy policies so that you understand the relevant information collection, use and disclosure practices of such other websites and services.

SECTION 1: PERSONAL INFORMATION WE COLLECT

We may collect information about you from different sources, as detailed below.

Information you give us:

The information that we collect from you will depend on the services that we provide to you and may include the following:

- – name, address and contact details;
- – e-mail address;
- – tax file/ID number;
- – bank account details;
- – identification and verification information;
- – credit and payment history; and
- – account balances and transaction history.

In some cases, you may provide personal information to us about another person. If so, you confirm that you have the authorisation of such person to provide us with this information.

We do not seek to collect special category personal data (as defined under Article 9 GDPR) as part of our standard services. Where the provision of our services incidentally involves such data, we will rely on an appropriate legal basis and will inform you separately.

Information we collect about you

As part of the standard operation of our websites, some information is collected automatically about your visits to the website and your device that accesses the website. We may automatically gather some of this "website usage information", such as: The domain and host you use to access the Internet; your computer's IP address; and mobile device geolocation and number. We may also collect 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. Additionally, we (and our service providers) may use cookies and other similar technologies to collect and track such information after obtaining your consent to this in accordance with applicable law.

Information we receive and collect from other sources:

We also work closely with third parties (such as business partners, and service providers, analytics providers, co-promotion partners, third parties associated with our customers, and credit reference agencies), and may receive demographic and other personal information about you from those third parties, which we may combine with the information that you have provided to us. We process all data that we obtain from those other sources in accordance with this Privacy Notice. Where we receive personal data from third parties, we take steps to verify that such data has been collected lawfully and that appropriate notice has been given to data subjects.

Where we store your data

Your personal information may be transferred from the EEA (European Economic Area) for processing in Canada, which is where our Company's data servers are located. Your data may also be processed in the United States, in Australia and in other countries by our affiliates and our service providers. We will ensure that such data are processed and transferred in accordance with this Privacy Notice and applicable laws. Where transfers are made to countries not recognised by the European Commission as providing an adequate level of data protection, we rely on appropriate safeguards such as EU Standard Contractual Clauses (SCCs) approved under Article 46 GDPR, or other recognised transfer mechanisms. A copy of the relevant SCCs is available upon request.

We will take all steps that are reasonably necessary to ensure that your personal information is treated securely and in accordance with this Privacy Notice and applicable data protection laws, including, where relevant, entering into EU Standard Contractual Clauses or equivalent approved safeguards under Article 46 GDPR with data recipients in such countries (a copy of the clauses is available at https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/standard-contractual-clauses-scc_en). Where required, we carry out or obtain Transfer Impact Assessments (TIAs) prior to transferring personal data to third countries, to assess whether the protections afforded by any transfer mechanism are effective in practice.

SECTION 2: HOW WE USE YOUR PERSONAL INFORMATION

We process your personal information in the following ways.

- In order to provide you with our services.
- To respond to your requests.
- For our, and our affiliates, marketing purposes, such as to notify you of any products that may be of interest to you.

- For joint marketing with other financial companies.
- To audit and monitor the services that we provide to you.
- To protect against fraud.
- For our, and our affiliates', other everyday business purposes such as to process your transactions; maintain your account(s); comply with our legal requirements, respond to court orders and legal investigations; report to credit bureaus; gather information about website access, usage and performance; improve our services and enhance your consumer experience; and validate your creditworthiness or your identity.
- To set up and manage your online account (including, for example, to send password reminders or notifications to changes to your account details) and to process your communication and privacy preferences.
- In addition, we record and monitor telephone calls in order to evidence business transactions, to ensure quality control and to improve internal training measures.

Why we process your personal information

In most circumstances, we process your personal information based on the following legal justifications:

- – in respect of the personal information that you provide to us in order to receive our services under a contract between us and you as an individual (and all other personal data that is generated in connection with your contract with us), we (and our affiliates) process your personal information as is necessary for the performance of that contract and
- – in respect of all other personal information, we (and our affiliates) process your personal information as necessary for our legitimate interests including in order to:
- comply with legal obligations to which we are subject (Article 6(1)(c) GDPR), including anti-money laundering, financial crime prevention, and regulatory reporting requirements;
- comply with our legal and regulatory obligations;
- keep our customers' payments secure;
- sell and supply services to our customers;
- understand our customers' behaviour, activities, preferences, and needs;
- send our customers details of similar products or services (Where you are a new or prospective customer, we will only send you direct marketing communications via email or text message with your consent, in accordance with Article 6(1)(a) GDPR.)
- fulfil our duties to our customers, shareholders and other stakeholders; and
- effectively handle any legal claims or regulatory enforcement actions taken against us.

Data Retention

Your personal information is stored by us and/or our service providers for as long as necessary to fulfil the specific purposes described in this Privacy Notice and to the extent permitted by applicable laws. It is a legislative requirement that we keep all personal information and records, generally for a period of 5-6 years. Should you cease to be a customer of ours, we will maintain your personal information on or off site in a secure manner: generally for a period of 5-7 years. When we no longer have a legitimate business purpose for your personal information, or when you request that we delete your personal information (except where we need to retain it in order to comply with a legal obligation/legislative requirement or to establish, exercise or defend legal claims), we will

remove such information from our systems and records, which includes taking steps to anonymise it so that you can no longer be identified from it.

SECTION 3: HOW WE DISCLOSE YOUR PERSONAL INFORMATION

We may share your personal information with certain third parties in connection with the provision of our services, including:

- Our group of companies, including our affiliates, head office and branches, in order to open your account with us, administer our services and products, provide you with customer support, process your payments, understand your preferences, send you information about products and services that may be of interest to you and conduct the other activities described in this Privacy Notice.
- Computer services consultants and technicians or other security and compliance consultants, in order to ensure the confidentiality and security of customer records.
- Technology providers, including providers of cloud computing services, AI-enabled software and productivity tools
- Financial service providers, such as banking partners and other payment rails, in order to carry out required institutional risk control, to carry out requested services and/or to protect against actual or potential fraud, unauthorized transactions, claims, or other liability.
- Where required or permitted by law, for example to government and/or law enforcement agencies; to check for potential red flags via credit and criminal background checks of prospective employees and prospective customers, as required or permitted by law.
- Inputting your information on a third-party customer relationship management platform.

SECTION 4: COOKIES

We use cookies to collect information about your activity, browser, and device when you visit our websites or websites where our ads appear. Cookies allow us to collect information such as browser type, time spent on the websites, pages visited, referring URL, language preferences, and other aggregated traffic data. Below is a summary of the types of cookies we use.

- **Essential Cookies:** These are cookies without which you would not be able to use our Websites. For example, essential cookies adjust the website data transmitted to match your internet connection, get you to the secure versions of the website, and help provide products or services you specifically request. If you set your browser to block these cookies, some parts of the website will not work.
- **Analytic Cookies:** These cookies count visits and traffic sources to measure and improve Website performance. We may use persistent cookies, which will remain on your computer even after you close your browser, to understand general website usage and volume statistical information (which does not include personal information) and improve the content and offerings on our websites. We may also use persistent cookies to store user preferences.
- **Functional cookies:** These cookies allow the website to remember choices you make and provide enhanced functionality and more personalized features. These technologies are used so that we can provide a continuous and more

personalized shopping experience for you (e.g., to recognize you by name when you return to a website).

- **Advertising Cookies:** These cookies help us manage and display our advertisements based on your activity on our Websites and other websites; this is known as interest-based advertising. We may use targeting cookies to gather demographic information about our user base as a whole. We may allow third-party ad servers (i.e., third parties that provide technology to place ads on websites and track ad performance) to use cookies, web beacons, and other technologies to automatically collect information about your visit to our websites or to place our ads on third-party websites and to analyze the effectiveness of those ads.

This Privacy Policy covers the use of cookies and other tracking devices by us. This Privacy Policy does not cover the use of cookies or other tracking technologies by any of our advertising partners. We encourage you to review the privacy policies or statements of these third-party advertising companies carefully. If you would like to learn more about the third-party advertisers that may be aware of the fact that you visit our websites, and to understand your choices about having such advertisers' cookies turned off, please visit www.networkadvertising.org.

If you want to remove or block cookies on your device, you can update your browser settings (your browser manufacturer has information on changing the default setting for your specific browser). You can find simple instructions on how to manage cookies on the different types of web browsers at www.allaboutcookies.org. You can also learn more about interest-based advertising and how to opt out of our vendors' and other advertisers' use of cookies and similar technologies to collect information to tailor content or advertising to you by visiting www.networkadvertising.org/managing/opt_out.asp and www.aboutads.info.

SECTION 5: SECURITY

We use administrative, technical, and physical measures to safeguard personal information against loss, theft and unauthorised uses, access or modifications.

Certain areas of our websites are password protected. Where we have given you (or where you have chosen) a password, you are responsible for keeping this password confidential. We ask you not to share your password(s) with anyone.

Payments made via our websites are processed in a secure environment using third party software.

In the event of a personal data breach, we will notify the relevant supervisory authority without undue delay and, where feasible, within 72 hours of becoming aware of the breach, in accordance with Article 33 GDPR. Where a breach is likely to result in a high risk to your rights and freedoms, we will also notify you directly without undue delay in accordance with Article 34 GDPR.

SECTION 6: EXERCISING PRIVACY RIGHTS

You have eight key rights in connection with our processing of your personal information, each of which is explained below. If you wish to exercise one or more of the first eight rights listed below, please contact us with your request at privacy@corpay.com. Please include your name, email and postal address, as well as your specific request and any other information we may need in order to provide or otherwise process your request.

We will respond to your request within one month of receipt. In complex cases or where we receive a large number of requests, we may extend this period by a further two months, in which case we will inform you of the extension and the reasons for it within one month of receiving your request, as required by Article 12 GDPR. We will not charge a fee for responding to your request unless the request is manifestly unfounded or excessive.

a) Access

You have the right to request a copy of the personal information that we are processing about you, which we will provide you in electronic form. For your own privacy and security, in our discretion we may require you to prove your identity before providing the requested information.

b) Rectification

You have the right to have us correct incomplete or inaccurate personal information that we process about you.

c) Deletion

You have the right to request that we delete personal information that we process about you, except we are not obligated to do so if we need to retain such data in order to comply with a legal obligation or to establish, exercise or defend legal claims.

d) Restriction

You have the right to restrict our processing of your personal information where: 1) such data are inaccurate, 2) our processing is unlawful, or 3) we no longer need to process such data for a particular purpose, but: it is a situation where we cannot delete the data either because of a legal obligation, or because you don't want us to delete the data. In such case, we would mark stored personal information with the aim of limiting particular processing for particular purposes in accordance with your request, or otherwise restrict its processing.

e) Portability

You have the right to obtain personal information that we hold about you, in a structured, electronic format, to enable data transfer to another data controller, provided: (a) The data are personal information which you have provided to us, and (b) we are processing that data either on the basis of your consent or to perform a contract with you.

f) Objection

Where the legal justification for our processing of your personal information is our legitimate interest, you have the right to object to such processing on grounds relating to your particular situation. We will abide by your request unless: 1) we have compelling legitimate grounds for the processing which override your interests and rights, or 2) we need to continue to process the data for the establishment, exercise or defence of a legal claim.

g) Withdrawing Consent

If you have consented to our processing of your personal information, you have the right to withdraw your consent at any time, free of charge. If you would like to withdraw consent, including if you would like to opt out of receiving marketing correspondence from us, or if you wish us to stop sharing your personal information with third party marketers, please contact us at privacy@corpay.com. To opt out of marketing you may also follow the unsubscribe instructions located in our marketing emails (as applicable).

Please understand that if you opt out of receiving promotional correspondence from us, we may still contact you in connection with your relationship, activities, transactions and communications with us. Additionally, if you do request that we stop sharing your personal information with third parties for their direct marketing purposes, it is also prudent you opt out from communications from that third party directly.

h) Make a Complaint

You have the right to lodge a complaint with the local data protection authority if you believe that we have not complied with applicable data protection laws. If you are based in the European Economic Area (EEA), please visit this website for a list of the relevant local data protection authorities: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

SECTION 7: OUR WEBSITES AND CHILDREN

We do not knowingly collect or sell information regarding anyone under the age of ~~13~~16. If you are a parent or guardian and believe we may have inadvertently collected personal information from your child, please notify us immediately by sending an email to privacy@corpay.com.

SECTION 8: MARKETING COMMUNICATIONS

If you no longer want to receive marketing-related emails from a Corpay entity, you may unsubscribe from that entity's mailing lists by clicking the unsubscribe link in the footer of any email from that entity. We will try to comply with your request as soon as reasonably practicable. If you opt out of receiving marketing emails from a Corpay entity, the Corpay entity may still send you important administrative messages, from which you cannot opt out.

Where we send direct marketing communications by electronic means, we do so only where we have a lawful basis for doing so, either your prior consent (for new and prospective customers) or, for existing customers, on the basis of the 'soft opt-in' where permitted by applicable law. All marketing communications will clearly identify us as the sender and will include a clear and accessible means to opt out of future communications.

SECTION 9: CUSTOMER REQUESTS

Corpay will coordinate with its U.S. subsidiaries, divisions, affiliates, and operations to respond to any requests, questions, or concerns that you submit to us.

From time to time, Corpay may also request the assistance from its international subsidiaries, divisions, affiliates, and operations in responding to certain requests. For example, certain requests that you send related to Stored Value Solutions, a division of Comdata Inc. ("SVS"), may be fulfilled by Buyatab Online Inc., a Canadian company owned by Corpay. This assistance will not change the Privacy Policy that governs.

SECTION 10: USE OF ARTIFICIAL INTELLIGENCE

We may use artificial intelligence ("AI") and machine learning technologies to support our business operations, including assisting our personnel with drafting documents and communications, analysing information, improving operational efficiency, and providing customer support.

Where these technologies process personal data on our behalf, they do so under our instructions and subject to appropriate contractual, technical and organisational safeguards designed to protect your personal information and maintain its confidentiality.

We do not use AI to make decisions about you that produce legal effects or similarly significant effects without appropriate human oversight, unless permitted by applicable law. Where AI-assisted tools are used in connection with our services, appropriately authorised personnel review and remain responsible for any decisions affecting our customers.

SECTION 11: INDIVIDUALS WITH DISABILITIES

If you have a disability and need access to our privacy policy in a different format, please contact us at privacy@corpay.com.

SECTION 12: CHANGES TO THIS PRIVACY POLICY

We may change this Privacy Notice from time to time and the amended notice will be posted on our websites. Under certain circumstances (for example, in connection with certain material adverse changes to this Privacy Notice), we may notify you through additional means, such as contacting you via email.

Where changes relate to new types of processing, including the use of automated or AI-assisted tools, we will provide clear advance notice and, where required by law, seek your consent before implementing such changes.

SECTION 13: CONTACT US

If you have any questions about this Privacy Notice and/or about the privacy policies and practices of our service providers, please contact us:

By email at privacy@corpay.com, or

By letter mail at: Corpay Cross-Border Data Protection Officer, Third Floor, Latin Hall, Golden Lane, Dublin 8, D08 PHE0, Ireland, or

By phone at +353 (0) 1245.7300