# SUPER PAYMENTS INC. PRIVACY NOTICE

**Last Updated:** November 1, 2026

This Privacy Notice describes how Super Payments Inc. ("**we**", "**us**", "**our**") collects, uses and discloses information about you when you use our website (superpayments.com), applications, services, tools and features, or otherwise interact with us (collectively, the "**Services**"). Our Services include checkout services, merchant services, Super membership and rewards, and referrals to third-party credit providers. A "Super Member" is a shopper who creates a Super account by providing a mobile number and completing one-time passcode verification in the Super app, online or at a merchant's checkout. A "Guest" is a shopper who uses our checkout services without creating a Super account. For the purposes of this Privacy Notice, "**you**" and "**your**" mean you as the user of the Services or another individual who interacts with us, including a Guest shopper, Super Member, merchant representative, director, beneficial owner or significant shareholder. Please note that the Services are designed for users in the United States only and are not intended for users located outside the United States.

Please read this Privacy Notice carefully. By using any of the Services, you agree to the collection, use, and disclosure of your information as described in this Privacy Notice. If you do not understand or agree to this Privacy Notice, please do not use or access the Services.

## 1. CHANGES TO THIS PRIVACY NOTICE

We may modify this Privacy Notice from time to time, in which case we will update the "Last Updated" date at the top of this Privacy Notice. If we make material changes to how we use or disclose information we collect, we will use reasonable efforts to notify you (such as by emailing you at the last email address you provided us, by posting notice of such changes on the Services or by other means consistent with applicable law) and will take additional steps as required by applicable law. If you do not agree to any updates to this Privacy Notice, please do not continue using or accessing the Services.

## 2. COLLECTION AND USE OF INFORMATION

When you use or access the Services, we collect certain categories of information about you from a variety of sources. In addition to the specific uses discussed below, we may use this information to provide and improve the Services and to maintain our business relationship, including by enhancing the safety and security of our Services, providing customer support, complying with applicable legal obligations, enforcing any applicable terms of service, and protecting our rights and the rights of our employees, users or other individuals.

We process certain information to provide checkout services to merchants. We also use information for our own purposes, including managing Super accounts and rewards, preventing fraud, securing and improving the Services and, where permitted, marketing, as described in this Privacy Notice.

*Information You Provide to Us*

Some features of the Services may require you to directly provide certain information, including information about yourself. You may elect not to provide this information, but doing so may prevent you from using or accessing these features. Information that you directly submit through our Services includes:

- **Basic contact details**, such as name, address, phone number, email and, if you represent a business, your job title. We use this information to create and maintain your account, provide the Services, and communicate with you (including to tell you about products or services that may be of interest to you, subject to your choices and applicable law, including obtaining your consent

where required). For Super Members, this may include email marketing about Super membership, rewards and available third-party credit offerings. We send marketing emails to Guests only if they opt in. We send marketing text messages only with your prior express written consent.. You may opt out of marketing as described in the Privacy Rights section below.

- **Account information**, such as a username or email address and hashed password for merchant portal accounts, and a telephone number and one-time passcode for shopper accounts. We use this information to provide the Services and to maintain and secure your account with us. If you choose to register an account, you are responsible for keeping your account credentials safe. We recommend you do not share your access details with anyone else. If you believe your account has been compromised, please contact us immediately.

- **Identity information**, such as the date of birth and identity verification documents of merchant representatives, directors, beneficial owners and significant shareholders. We use this information to verify merchants and their representatives, prevent fraud and comply with applicable legal obligations. Identity checks for credit applications are carried out by our third-party credit providers in their own application flows.

- **Preferences and feedback**, such as your marketing and communication preferences and any interests, feedback or survey responses you choose to provide. We use this information to tailor and improve the Services and our communications, subject to your choices and applicable law.

- **Payment information**, such as billing information, encrypted or tokenized card information and card identifiers, which we collect using third-party payment processors. Full card details are provided directly to the payment processor; we do not hold full card numbers or card security codes. We use this information to process your payment and provide the Services.

- **Purchase and rewards information**, such as shipping information, items purchased, travel and reservation details (such as flight numbers, travel dates and times, and names of fellow travelers or companions), transaction amounts and history, payment status, refunds, disputes and rewards earned or redeemed. We use this information to process transactions and refunds, maintain purchase records, provide support and administer rewards. Rewards for Super Members are merchant-funded discounts on eligible future purchases.

- **Merchant onboarding information**, such as business contact details, ownership and control information, and identification details about directors, beneficial owners and significant shareholders. We use this information to onboard and verify merchants, prevent fraud and comply with applicable legal obligations.

- **Any other information you choose to include in communications with us**, for example, when sending a message through the Services, which we use to respond to you.

Where information about products purchased may indicate health status, we use that information only to process the transaction, provide rewards and support, and keep transaction records.

*Information Collected Automatically*

We and third parties may also use cookies, pixels or other tracking technologies to automatically collect certain information about your interactions with the Services. This information is collected and used to tailor your experience with the Services, provide you with offers or promotions, run analytics, better understand user interactions with the Services and to target, deliver and measure interest-based advertising, subject to your choices and applicable law, including obtaining your consent where required. Such information includes:

- **Device information**, such as device type, operating system, unique device identifier, and internet protocol (IP) address.

- **Location information**, such as approximate location derived from your IP address.

- **Other information regarding your interaction with the Services**, such as browser type, log data, date and time stamps, clickstream data, interactions with marketing emails, ad impressions, session recordings, and responses to personalized URLs and QR codes.

We use third-party service providers to record how users navigate and interact with the Services. We use these session recordings to better understand user interactions, troubleshoot issues and improve the Services. We use masking or redaction controls designed to prevent identifiable personal information from appearing in these recordings.

Most browsers accept cookies automatically, but you may be able to control the way in which your devices permit the use of cookies. If you so choose, you may block or delete certain of our cookies from your browser; however, blocking or deleting cookies may cause some of the Services, including any portal features and general functionality, to work incorrectly.

Your browser settings may also allow you to transmit a "Do Not Track" signal when you visit various websites. Like many websites, our website is not designed to respond to "Do Not Track" signals received from browsers. Where required by applicable law, we honor opt-out preference signals, including Global Privacy Control (GPC), as requests to opt out of the sale of your personal information, the sharing of your personal information for cross-context behavioral advertising, and the processing of your personal information for targeted advertising.

For more information on how we use cookies, please see our Cookie Policy.

*Information Collected From Other Sources*

We may obtain information about you from outside sources, including information that we collect directly from third parties and information from third parties that you choose to share with us. Such information includes:

- **Order, payment, settlement, refund and dispute information** we receive from merchants, payment processors, banks and payment networks, which we use to process payments, administer rewards, reconcile transactions and provide support.

- **Identity verification and fraud prevention information**, such as email and telephone validation, online-presence and data-breach indicators, device and IP-address risk information, payment-card issuer information, fraud alerts, sanctions and watchlist screening results and fraud risk scores. We receive this information from verification providers, shared fraud-prevention networks and public sources, and use it to verify users, prevent fraud, secure the Services and comply with applicable legal obligations.

- **Merchant verification information**, such as identity and document-check results, directorships and beneficial ownership, sanctions and politically exposed person screening, adverse media, and relevant court, insolvency and credit-reference information about merchants and their directors, beneficial owners and significant shareholders. We receive this information from business verification providers and public records and use it for merchant onboarding, due diligence and ongoing monitoring.

- **Analytics data** we receive from analytics providers such as Google Analytics, which we use to improve our website, communications and the Services.

- **Business contact information**, such as business email addresses, phone numbers, company names and domains, that we receive from marketing databases or other data enrichment companies, which we use to better customize advertising and marketing to you.

Any information we receive from outside sources will be treated in accordance with this Privacy Notice. We are not responsible for the accuracy of the information provided to us by third parties and are not responsible for any third party's policies or practices. For more information, see the section below, *Third-Party Websites and Links*.

*Deidentified Information*

Finally, we may deidentify or anonymize your information such that it cannot reasonably be used to infer information about you or otherwise be linked to you (or we may collect information that has already been deidentified/anonymized), we will not attempt to reidentify such information, and we may use such deidentified/anonymized information for any purpose. If aggregated information can reasonably be linked to you, we treat it as personal information subject to this Privacy Notice.

## 3. DISCLOSURE OF YOUR INFORMATION

We may disclose your information for the purposes described in this Privacy Notice, including the following categories of third parties:

- Our affiliates or others within our corporate group to efficiently provide the Services.

- Vendors or other service providers who help us provide the Services, including for system administration, cloud storage, security, identity and business verification, fraud prevention, customer support, customer relationship management, marketing communications, web analytics, session recording, payment networks, and payment processing.

- Merchants with whom you transact, to whom we disclose relevant contact details, billing and shipping information, order and transaction information, payment status and refunds for order fulfilment, reconciliation, refunds, customer service and reporting. We may also provide merchants with aggregated reports, such as spending trends by product category, that cannot reasonably be used to identify you.

- Payment processors, settlement banks and payment networks, to whom we disclose information needed to process payments, refunds and chargebacks and settle funds to merchants. Our payment processor may also use payment information for its own purposes, such as its own legal and anti-money-laundering obligations, in accordance with its own privacy notice.

- Third-party credit providers, to whom we disclose contact and transaction information when you choose to apply for credit through the Services, to facilitate your application. These providers process your information in accordance with their own privacy notices, including in connection with assessing your application, making lending decisions and carrying out any credit-reference checks. We facilitate referrals to these providers and do not provide credit ourselves.

- Fraud-prevention networks and participating businesses, through which identifiers such as email addresses, telephone numbers, IP addresses and device identifiers may be checked and associated fraud indicators made available to prevent fraud and secure accounts and transactions.

- Advertising and marketing partners, to whom we disclose online identifiers, IP addresses, browsing and app activity, hashed email addresses or telephone numbers, and business contact and conversion-event information, as applicable, to show and measure our advertising, retarget visitors, create advertising audiences and measure sales and marketing outcomes.

- Third parties to whom you request or direct us to disclose information, such as sharing with a credit provider at your request.

- Professional advisors, such as auditors, law firms, or accounting firms to assess, protect, enforce and defend our rights and to comply with our legal and regulatory obligations.

- Third parties in connection with or anticipation of an asset sale, merger, bankruptcy, or other business transaction to run a successful and efficient business.

We may also disclose your information as needed to comply with applicable law or any obligations thereunder or to cooperate with law enforcement, judicial orders, and regulatory inquiries, to enforce any applicable terms of service, and to ensure the safety and security of our business, employees, and users.

## 4. THIRD-PARTY WEBSITES AND LINKS

We may provide links to third-party websites or platforms. If you follow links to sites or platforms that we do not control and are not affiliated with us, you should review the applicable privacy notice, policies and other terms. We are not responsible for the privacy or security of, or information found on, these sites or platforms. Information you provide on public or semi-public venues, such as third-party social networking platforms, may also be viewable by other users of the Services and/or users of those third-party platforms without limitation as to its use. Our inclusion of such links does not, by itself, imply any endorsement of the content on such platforms or of their owners or operators.

## 5. CHILDREN'S PRIVACY

Our Services are intended for individuals aged 18 and over. Our Services are not intended for children, and we do not seek or knowingly collect any personal information about children. We do not knowingly sell or share the personal information of consumers under 16 years of age. If we learn that a user is under 18, we will close the account and stop any sharing of their information. If we become aware that we have unknowingly collected information about a child, in particular any child under 13 years of age, we will make commercially reasonable efforts to delete such information from our database. If you are the parent or guardian of a child under 13 years of age who has provided us with their personal information, you may contact us using the below information to request that it be deleted.

## 6. DATA SECURITY AND RETENTION

We maintain administrative, technical and physical safeguards designed to protect your information against unauthorized access, use or disclosure. We have procedures to address suspected security incidents and will notify affected individuals and relevant authorities where required by applicable law. Despite our reasonable efforts to protect your information, no security measures are impenetrable, and we cannot guarantee "perfect security." Any information you send to us electronically, while using the Services or otherwise interacting with us, may not be secure while in transit. We recommend that you do not use unsecure channels to send us sensitive or confidential information.

We retain your information for as long as is reasonably necessary for the purposes specified in this Privacy Notice. When determining the length of time to retain your information, we consider various criteria, including whether we need the information to continue to provide you the Services, resolve a dispute, comply with applicable legal obligations, enforce our contractual agreements, prevent harm, promote safety, security and integrity, or protect ourselves, including our rights, property or products. We also consider the amount, nature and sensitivity of the information, the potential risk of harm from unauthorized use or disclosure, and whether we can achieve the purposes for which we process the information through other means.

## 7. DATA TRANSFERS

We are based in the United States. Please be aware that the information we collect from you may be transferred to, stored and processed in the United States, the United Kingdom or other countries outside your country of residence.

## 8. PRIVACY RIGHTS

Depending on where you live, you may have certain rights in relation to your personal information. Please note that a number of these rights only apply in certain circumstances, and all of these rights may be limited by law.

- **Access / Know**: You may have the right to request access to the personal information we hold about you (including inferences about you), and to obtain information about how we use it, and with whom we share or have shared it in the past. You may also have the right to obtain a list of the specific third parties to whom we have sold or disclosed your personal information or, where permitted by applicable law, personal information generally.

- **Deletion / Erasure**: You may have the right to request that we delete personal information we hold about you.

- **Correction**: You may have the right to correct inaccurate personal information we hold about you.

- **Portability**: You may have the right to receive a copy of the personal information we hold about you and to request that we transfer it to a third party.

- **Opt-Out of Marketing**: You may opt out of marketing at any time by using the unsubscribe / opt-out function displayed in our communications to you or by contacting us using the information below. Please note that if you opt out, we may still send you transactional or administrative messages, such as emails about your account and one-time passcodes used to access your account, where permitted by applicable law and consistent with your text-message preferences. We may retain limited information needed to record and honor your marketing preferences.

- **Opt-Out of Sale, Sharing, Targeted Advertising and Profiling**: You may have the right to opt out of the sale of your personal information, the sharing of your personal information for cross-context behavioral advertising, the processing of your personal information for targeted advertising, and profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. To exercise your rights to opt out of sale, sharing for cross-context behavioral advertising, or targeted advertising, please contact privacy-us@superpayments.com for assistance.

- **Automated Decision-making:** You may have the right to request human review of, express your views on or contest the outcomes of automated decision-making. You may also have the right to know whether we or our processors use your personal information for profiling in furtherance of decisions that produce legal or similarly significant effects concerning you. For such decisions, you may have the right to question the result, obtain the reasons, review the personal information used, have inaccuracies corrected and the decision reevaluated and, where feasible, learn what actions could have led, or could lead, to a different decision.

- **Withdrawal of Consent**: Where we rely on your consent to process your personal information, you may withdraw that consent using the applicable preference or unsubscribe controls. You may also contact privacy-us@superpayments.com for assistance.

To make a request described in this Section, please contact us at the email address listed below. Where applicable law provides a right of appeal, you may appeal our decision not to act on your request by contacting us at the email address listed below. We will respond in writing with the outcome of your appeal and our reasons within the time required by applicable law. Where required by applicable law, our response will also explain how you can submit a complaint to your state attorney general or other relevant regulator.

You may also have the right to submit a complaint to your state attorney general or other relevant regulator about how we process your personal information.

## 9. HOW TO CONTACT US

Should you have any questions about our privacy practices or this Privacy Notice or wish to exercise your privacy rights or submit a privacy complaint, please email us at privacy-us@superpayments.com or contact us at Super Payments Inc., 8950 SW 74th Court, Suite 2201 PMB B12, Miami, FL 33156.