

# Information Policy

effective 12/01/2007

The following policy sets forth how JPMorgan Xign Corporation and its affiliates ("JPMorgan Xign") collects, uses and discloses the information about JPMorgan Xign Customers and their authorized representatives on this website ("Customer Information"). A "Customer" is any person or entity enrolled in the JPMorgan Business Settlement Network ("JBSN" or the "Network"), whether enrolled directly or by another entity. This policy applies to [www.xign.net](http://www.xign.net), [www.xign.com](http://www.xign.com), and related sub domains such as <http://support.xign.net>, <http://emea.xign.net>, and <ftp://xignftp.xign.net>.

## **Information Collected.**

During the Customer enrollment, JPMorgan Xign collects information, including, but not limited to, name, work address, e-mail address, taxpayer identification number or equivalent, bank account information, the names of principal authorized representatives who will work with JPMorgan Xign, and any other information JPMorgan Xign needs in order to provide access to JPMorgan Xign's software applications and services to its Customers. Customers who use the Network select or are assigned user names and passwords and may acquire digital signature certificates and establish personal identification numbers (PINs), all of which are used to identify the Customers when they are using the Network.

JPMorgan Xign also collects information to process payment transactions for its Customers, including the amount of the Customer's payments, the recipient, the bank accounts to be debited and credited and remittance information necessary to allow correct crediting of Customer's payments.

JPMorgan Xign may collect names, postal or e-mail addresses, and phone numbers of non-Customer visitors to JPMorgan Xign's website to complete pending enrollment applications, to provide access to product demonstrations, and to respond to inquiries regarding the Network. JPMorgan Xign may retain copies of any communications JPMorgan Xign sends to or receives from Customers and other visitors to our site for our records but does not use this information except in accordance with the terms of this Policy.

## **Personal Data.**

Some of the information JPMorgan Xign collects about individuals may constitute personal data (including sensitive personal data) under the EU Data Protection Directive and implementing laws, and laws of other countries throughout the world. Where those laws apply, individuals about whom JPMorgan Xign processes personal data may request a copy of the personal data held in relation to them by JPMorgan Xign. JPMorgan Xign may, where allowed by law, charge a fee for this. Also, if any personal data is found to be wrong, the individual concerned has the right to request JPMorgan Xign to amend, update or delete it, as appropriate. Further details, as amended from time to time are available at <http://www.jpmorgan.com/directdoc/privacy/emea.pdf>.

## **Use of Collected Information.**

JPMorgan Xign utilizes the information submitted by prospective Customers to authenticate and verify the identity of such prospective Customers who may be communicating with JPMorgan Xign. JPMorgan Xign will use the information it collects during the enrollment process, and other information it collects while authenticating the identity of prospective Customers to evaluate the Customer's application for use of the Network, for marketing purposes, and to conduct continuing security, monitoring, and risk assessment.

JPMorgan Xign uses information it collects from Customers in connection with payment transactions to complete the transactions. JPMorgan Xign may use such information to operate, maintain and enhance the Network and other services offered by JPMorgan Xign. JPMorgan Xign also uses such information for marketing and to bill Customers for their use of JPMorgan Xign's services and to monitor compliance with the rules and policies of the Network.

In order to increase the utility of the Network, JPMorgan Xign may use information provided by disburser customers about its suppliers for soliciting the enrollment of such suppliers to become, and enrolling them as, users of the Network.

JPMorgan Xign compiles and analyzes Customer Information into aggregated research reports. JPMorgan Xign may share this aggregated data with its business partners. However, except as set forth below,

aggregated information is not identified with any particular Customer or any particular Customer's representative.

**Other Information hosted by JPMorgan Xign.**

As part of the Network, JPMorgan Xign may hold, host and, when appropriate allow access to, electronic documents such as purchase orders, payments and invoices that may include personal information such as name and contact details of various individuals. This information is used for the provision of Network service to Customers.

**Updating or deleting of information collected by JPMorgan Xign.**

Customers have a responsibility to keep certain information current particularly with respect to authorized representatives. Customers may correct, change or update the Customer Information and information about their authorized representatives through the Disburser Administrator or Collector Administrator applications at [www.xign.net](http://www.xign.net).

**Information Sharing.**

JPMorgan Xign, its authorized representatives and service providers have access to the Customer Information and will not disclose Customer Information to nonaffiliated third parties except to perform its services or as otherwise required or permitted by law.

**Cookies.**

A cookie is a text-only string of information that a website stores on your computer's hard disk so that the website can remember certain information about you. This can include which pages you have visited, choices you have made from menus, any specific information you have entered into forms and the time and date of your visit. Cookies cannot be used by themselves to identify you.

Two types of cookies are used on this website:

Session cookies (temporary cookies that remain on your computer until you leave the site) to carry information across pages of our site and avoid you having to re-enter information each time you enter a new page.

Persistent cookies (that remain on your computer even after the browser is closed) to help us recognize you as a unique user when you return to our website.

This website needs to have Cookies enabled to function correctly. If for any reason you cannot or do not wish us to use Cookies, it will not be possible for you to use this service.

**Log Files.**

As is true of most websites, we gather certain information automatically and store it in log files. This information includes internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, date/time stamp, and clickstream data. We use this information, which does not identify individual users, to analyze trends, to administer the site, to track users' movements around the site and to gather demographic information about our user base as a whole. We do not link this automatically collected data to personally identifiable information.

**Customer choices regarding collection, use and sharing of Customer Information.**

By using the Network and becoming a Customer, each Customer agrees that JPMorgan Xign may collect, use and share information (as detailed in this Policy ) from and about the Customer. If a prospective Customer does not agree to this Policy, it may not become a Customer.

JPMorgan Xign may offer a Customer the opportunity to receive offers and information about products and services from JPMorgan Xign and its partners that JPMorgan Xign believes may be of interest to the Customer. The Customer will be provided a choice whether to accept or not accept this offer. If Customer accepts, JPMorgan Xign (or agents working on behalf of JPMorgan Xign) may occasionally send the Customer such offers and information. If Customer does not accept, then Customer will not receive such offers and information from JPMorgan Xign. If Customer initially accepts, Customer will be provided

opportunity to discontinue receiving such information each time it is sent.

**Security Precautions and Other Web Sites.**

Customer's communications through this website are secure. JPMorgan Xign also maintains information security within the Network. While no encryption and system security are impregnable, there are security protections involved in using the Network. This Policy covers exchanges of information within the JPMorgan Xign sites. The JPMorgan Xign sites may contain links to other sites but JPMorgan Xign is not responsible for the security, privacy policies or the content of such sites. Please be sure to check the privacy policies and security policies of each site you access through JPMorgan Xign, as they may differ.

**Changes to the Policy.**

JPMorgan Xign may change this Policy at any time and will post the new Policy on our websites. Any change to this Policy will become effective immediately. Continued use of the Network following posting of the new Policy will mean that the Customer accepts such changes, which shall also bind its authorized representatives. If a Customer does not agree to any such change, it must terminate its agreement with JPMorgan Xign and cease using the Network.

**Contacting JPMorgan Xign.**

If you have any questions about this Policy you can contact [privacy@xign.com](mailto:privacy@xign.com) or at 7077 Koll Center Parkway, Pleasanton, CA 94566.

12/01 /2007