

Information Protection Policy:

Background

FinTech Solutions has more assets than the physical world you see by looking around you. These assets are information, which is critical to doing business, keeping the trust of our customers, and keeping our future strong. This policy outlines our commitments to our employees, customers, and to our future regarding how we will handle this information.

Information can be sensitive by its nature, and can also be sensitive due to regulations and industry standards. The types of sensitive information can include:

- Customer information (both for customer companies and for people as individuals)
- Financial information, including credit cards, salaries, banking, transactions and more
- Medical information of all types
- Company patents, business plans, and other intellectual property
- Company business records and planning materials, including our customer list, marketing and sales efforts, product line plans, and more.
- Copyrighted materials, both which our company creates and those which we obtain under license from others

This information may reside on our computing systems or backup devices, may traverse the networks, be on paper, or be in people's minds. All locations must be properly controlled.

The rules by which information is handled are determined by the regulations, business requirements, and company commitments relating to that type of information. Put together, these are called the significance of the information.

Every employee, vendor, contractor, supplier or vendor, agent or representative of our company must be aware of the significance of the information being handled, and ensure that proper controls are applied to prevent copying, disclosure, or other misuse of the information.

This Information Protection policy is a part of the overall security and privacy effort of our company. Other policies and controls may also apply, as issued by the Human Resources and Security teams. These are available in the employee handbook, or on the company's intranet site.

Penalties for violating these policies may include disciplinary actions up to termination of employment, or termination of the business relationship with our company.

Our company relies upon employees and business partners to properly develop, maintain, and operate our systems, networks, and processes which keep our sensitive information safe and properly used. This means that every person and organization handling our information has the responsibility to keep the information safe, no matter where the information is located. This includes computing systems, networks, paper copies, business processes, and verbal transmission of information.

Our company's policy:

* We will meet all applicable requirements in properly protecting the information, including: Laws, Regulations, Industry standards, Contractual commitments

* The protections we apply to information assets will be in proportion to the value and sensitivity of the information, and will balance the sensitivity of the information against: The cost of controls, The impact of the controls on the effectiveness of business operations, The risks of disclosure, modification, destruction, or unauthorized use of the information

* We will protect all types of sensitive information, including but not limited to: Medical, Financial, Credit, Business transaction and planning, Personal information, both of our employees and of our customers

- * We will ensure that these controls are accepted by all employees, vendors, service providers, representatives and associates of our company who may have access to our information. This includes ensuring that all personnel at all levels are aware of, and are held accountable for safeguarding information assets.
- * We will ensure that access to information is controlled, and based upon, job function and need-to-know criteria.
- * We will maintain proper business continuity and security procedures, including information systems, networks, resources, and business processes.
- * We will report any suspected or actual breach of these policies, and will cooperate with investigative agencies.
- * We will comply with other, related policies, including the Company's privacy policies.

Privacy Policy for Customers:

It is a part of our company's core values that we will properly value and protect any information entrusted to us about our customers. This policy describes how we will safeguard personal and company information, to ensure peace of mind when dealing with our company.

It is our policy that:

- * Our company will collect only that information about customers which is needed and relevant.
- * Our company will not disclose information to other parties unless customers have been properly notified of such a disclosure.
- * Our company will strive to make certain that information about customers is kept accurate and up-to-date.
- * Our company will use appropriate controls to ensure that this information is kept secure, and is only viewed or used by the proper personnel.
- * Our company will comply with applicable laws, regulations, and industry standards when protecting employee information.
- * We hold our employees, vendors, contractors, suppliers, and trading partners to meet this same set of policies.